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**VIA FEDERAL EXPRESS**

Lawrence D. Sanders, Esq.  
Turner Environmental Law Clinic  
Emory University School of Law  
1301 Clifton Road  
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Patrick A. Moulding, Esq.  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
1155 Rockville Pike, Stop O-15 D21  
Washington, D.C. 20852-0001

**Re: Sixteenth Supplemental Disclosures Pursuant to 10 CFR § 2.336 for Contentions EC 1.2 and EC 1.3 Admitted on March 12, 2007 (LBP-07-03); Southern Nuclear Operating Co. (Early Site Permit for Vogtle ESP Site), Docket No. 52-011-ESP**

Dear Messrs. Sanders and Moulding:

Pursuant to 10 CFR § 2.336 and the agreement between the parties as set forth in the Atomic Safety and Licensing Board's ("ASLB") Order of April 3, 2007 regarding mandatory disclosures ("April 3 Order"), Southern Nuclear Operating Company, Inc. ("Southern Nuclear") is providing the attached sixteenth supplemental disclosures regarding Contentions EC 1.2 and EC 1.3 admitted by the ASLB's Order of March 12, 2007. Attached is a supporting affidavit of Mr. Charles R. Pierce, Southern Nuclear's Vogtle Deployment Licensing Manager.

**Documents and Data Compilations:**

Attachment A provides a description of additional documents in the possession, custody, or control of Southern Nuclear that are relevant to the admitted contentions. Southern Nuclear is still in the process of reviewing each document identified in Attachment A to confirm whether or not they contain proprietary or privileged information. We will make those final determinations only as you request copies of specific documents. Thus, Attachment A may be over-inclusive in some respects in that it may include documents that are not discoverable based on 10 CFR § 2.336 or the ASLB's April 3 Order.

Sincerely,

K.C. Hairston

KCH:dkf

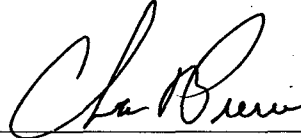
Attachment

Document No.	Beginning Bates	Ending Bates	Document Name	Document Date	Source	Document Type
SNC638	TBD	TBD	Email from Matthew Montz to Anthony Dodd regarding Pump Rate Information	10/16/2008	Southern Nuclear	Email
SNC639	TBD	TBD	Trip Report 13 and related study sheets	9/11/2008	Southern Nuclear	Report
SNC640	TBD	TBD	Trip Report 14 and related study sheets	9/25/2008	Southern Nuclear	Report
SNC641	TBD	TBD	Trip Report 15 and related study sheets	10/8/2008	Southern Nuclear	Report
SNC642	TBD	TBD	Email from Matthew Montz to Jonathan Ponstein regarding ADCP Information	9/16/2008	Southern Nuclear	Email



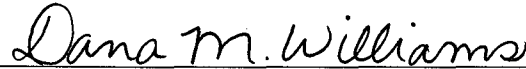
its applicable affiliates and contractors) of Southern Nuclear. Further, to the best of my knowledge, information and belief, and based on the review of information and documentation currently reasonably available to and under the possession, custody, or control of Southern Nuclear, these disclosures are accurate and complete as of this date.

Further, the affiant sayeth not.



\_\_\_\_\_  
CHARLES R. PIERCE

Subscribed and sworn to before me this 21st day of October, 2008.



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NOTARY PUBLIC

My Commission Expires: 12/29/2010

