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**VIA FEDERAL EXPRESS**

Lawrence D. Sanders, Esq.  
Turner Environmental Law Clinic  
Emory University School of Law  
1301 Clifton Road  
Atlanta, GA 30322

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: Nineteenth Supplemental Disclosures Pursuant to 10 CFR § 2.336 for Contentions EC 1.2 and EC 1.3 Admitted on March 12, 2007, and Contention EC 6.0 Admitted on October 24, 2008 (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 nineteenth supplemental disclosures regarding Contentions EC 1.2 and EC 1.3 admitted by the ASLB's Order of March 12, 2007, and Contention EC 6.0 admitted by the ASLB's Order of October 24, 2008. 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

**UNITED STATES OF AMERICA**  
**NUCLEAR REGULATORY COMMISSION**  
**Before the Atomic Safety and Licensing Board**

In the Matter of	)	
	)	Docket No. 52-011-ESP
Southern Nuclear Operating Company	)	
	)	ASLBP No. 07-850-01-ESP-BD01
(Early Site Permit for Vogtle ESP Site)	)	
	)	December 3, 2008

**CERTIFICATION OF THE NINETEENTH SUPPLEMENTAL DISCLOSURE**  
**AFFIDAVIT OF CHARLES R. PIERCE**

COUNTY OF SHELBY    )  
                                  )  
STATE OF ALABAMA    )

I, **CHARLES R. PIERCE**, being duly sworn according to law, depose and state the following:

I am the Vogtle Deployment Licensing Manager for Southern Nuclear Operating Company, Inc. ("Southern Nuclear"). My business address is 42 Inverness Center Parkway, Birmingham, Alabama 35242. I am authorized to provide this certification on behalf of Southern Nuclear.

To the best of my knowledge, information and belief, Southern Nuclear's Nineteenth Supplemental Disclosure in the above captioned proceeding contains all materials required to be disclosed by 10 C.F.R. § 2.336, as modified by the Atomic Safety and Licensing Board's Orders of April 3, 2007 and October 24, 2008 (Ruling Regarding Joint Motion on Mandatory Disclosures and Scheduling Prehearing Conference), that were identified as relevant through a search of the information and documentation reasonably available to and under the possession, custody, or control (including

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  
CHARLES R. PIERCE

Sworn to and subscribed before me this 2 day of December, 2008

Long Cameron  
NOTARY PUBLIC  
My Commission Expires: ~~12/29/2010~~

**My Commission Expires  
August 14, 2012**

Document No.	Beginning Bates	Ending Bates	Document Name	Document Date	Source	Document Type	Proprietary
SNC787	TBD	TBD	E-mail from Charles White to Carl Desisto regarding Vogtle Logistics Study	6/13/2008	Shaw	E-mail	
SNC788	TBD	TBD	E-mail from Dolan Bradberry to Glen Newberry, et al. regarding contract request and attached documents	6/17/2008	Shaw	E-mail	
SNC789	TBD	TBD	E-mail from Alan Beckman to Norman Boyter, et al. regarding meeting notes and attached document	6/9/2008	Shaw	E-mail	
SNC790	TBD	TBD	E-mail from Carl Desisto to Charles White, et al. regarding Vogtle Transportation Plan	7/22/2008	Shaw	E-mail	
SNC791	TBD	TBD	Meeting notes regarding meeting with COE on dredging	5/28/2008	Shaw	Report	
SNC792	TBD	TBD	E-mail from Glen Newberry to Robert Holt regarding Vogtle Logistics Study	6/16/2008	Shaw	E-mail	
SNC793	TBD	TBD	E-mail from David Lotterhos to Glen Newberry, et al. regarding Vogtle Barge Slip	8/28/2008	Shaw	E-mail	
SNC794	TBD	TBD	E-mail from David Lotterhos to Dolan Bradberry, et al. regarding Condition Survey and attached document	6/12/2008	Shaw	E-mail	
SNC795	TBD	TBD	E-mail from Ed Day to James Cuchens, et al. regarding AP1000 Nuclear Support	11/19/2008	Southern Company Services	E-mail	
SNC796	TBD	TBD	E-mail from Jeffrey Wilson to Tanya Blalock, et al. regarding proposed nuclear expansion	10/28/2008	Southern Company Services	E-mail	
SNC797	TBD	TBD	E-mail from Anthony Dodd to Kenneth Middlebrooks, et al. regarding P.O.D. River Study	11/14/2008	Georgia Power Company	E-mail	
SNC798	TBD	TBD	Trip Report 17 regarding River Survey	11/11/2008	Georgia Power Company	Report	
SNC799	TBD	TBD	E-mail from Anthony Dodd to Matthew Montz regarding plant withdrawal rate	10/16/2008	Georgia Power Company	E-mail	
SNC800	TBD	TBD	Savannah River at Risk Final Report	9/30/2008	Southeastern Natural Sciences Academy	Report	
SNC801	TBD	TBD	Vogle 3 & 4 Site Activities Update		Southern Nuclear	Report	Yes
SNC802	TBD	TBD	COE Memorandum of Understanding for Regulation of Nuclear Power Plants	7/2/1975	COE	Memo	
SNC803	TBD	TBD	E-mail from Jessica Joyner to Matthew Montz regarding intake canal	10/26/2008	Southern Nuclear	E-mail	
SNC804	TBD	TBD	E-mail from Tom Moorer to Steve Nance, et al. regarding meeting notes	6/6/2008	Southern Nuclear	E-mail	
SNC805	TBD	TBD	E-mail from Mitch Bruhn to Tom Moorer regarding appropriations to COE	5/30/2008	Westinghouse	E-mail	