

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before the Licensing Board:

G. Paul Bollwerk, III, Chairman  
Nicholas G. Trikouros  
Dr. James Jackson

In the Matter of

SOUTHERN NUCLEAR OPERATING CO.

(Early Site Permit for Vogtle ESP Site)

Docket No. 52-011-ESP

ASLBP No. 07-850-01-ESP-BD01

JOINT INTERVENORS' NOTICE OF EXECUTION OF  
NONDISCLOSURE DECLARATION

Pursuant to the Atomic Safety and Licensing Board's protective order dated December 19, 2008, Joint Intervenors<sup>1</sup> hereby notify the parties that the following persons have executed a nondisclosure declaration in the form included as Attachment A to the protective order:

- 1) Russell Ross
- 2) Teresa Porter
- 3) Erica L. Tritt
- 4) Donald F. Hayes
- 5) James Terpening

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<sup>1</sup> The Joint Intervenors include the Center for a Sustainable Coast, Savannah Riverkeeper, Southern Alliance for Clean Energy, Atlanta Women's Action for New Directions, and Blue Ridge Environmental Defense League.

A true and correct copy of each executed nondisclosure is attached hereto as Attachment A.

Respectfully submitted this 7th day of January, 200,

**[Signed electronically by L. Sanders]**

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Lawrence D. Sanders  
Turner Environmental Law Clinic  
Emory University School of Law  
1301 Clifton Road  
Atlanta, GA 30322  
(404) 727-3432  
Email: [lsanders@law.emory.edu](mailto:lsanders@law.emory.edu)

Diane Curran  
Harmon, Curran, Spielberg & Eisenberg, LLP  
1726 M Street N.W., Suite 600  
Washington, D.C. 20036  
(202) 328-3500  
Email: [dcurran@harmoncurran.com](mailto:dcurran@harmoncurran.com)

ATTACHMENT A

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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NONDISCLOSURE DECLARATION

Under penalty of perjury, I hereby certify that (i) access to "proprietary documents," as that term is defined in the Atomic Safety and Licensing Board's protective order dated December 19, 2008, has been provided to me pursuant to the terms and restrictions of the protective order; (ii) I have been given a copy and have read the protective order; and (iii) I agree to be bound by the terms of the protective order. I understand and agree that proprietary documents, their contents, or any notes or other memoranda summarizing or otherwise describing their contents, or any form of information that derives from the proprietary documents and copies or discloses the contents of the proprietary documents, shall be held in confidence and shall not be disclosed to anyone except in accordance with the protective order. I acknowledge that a violation of this declaration or the protective order, which incorporates the terms of this declaration, constitutes a violation of an order of the Nuclear Regulatory Commission and may result in the imposition of such sanctions as the Atomic Safety and Licensing Board or the Nuclear Regulatory Commission may deem to be appropriate.

- 2 -

WHEREFORE, I do solemnly swear to protect such proprietary documents, and their contents, as may be disclosed to me in this proceeding, in accordance with the terms of this declaration.

[Note: For NRC representatives executing this nondisclosure declaration, an executed agreement will be modified to contain the following additional sentence: "My agreement and acknowledgment, however, are not binding on the Nuclear Regulatory Commission's fulfillment of its obligations under the Freedom of Information Act."]

Name (printed): DONALD F. HAYES  
Title: Expert: Civil Engineer  
Employed by or Representing: Turner Environmental Clinic  
Signature: Donald F. Hayes  
Date: 1/6/08

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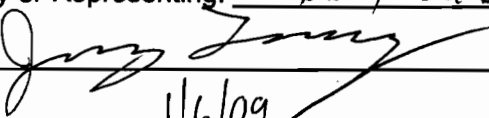
ASLBP No. 07-850-01-ESP-BD01

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Name (printed): James Teperling  
Title: Student Attorney  
Employed by or Representing: Emory Law Student-Turn-Environmental Law Clinic  
Signature:   
Date: 1/6/09

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Name (printed): Russell Ross  
Title: Student Attorney  
Employed by or Representing: Turner Environmental Law Clinic  
Signature: RR  
Date: 1/7/2009

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In the Matter of

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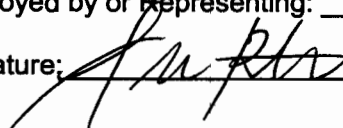
ASLBP No. 07-850-01-ESP-BD01

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Name (printed): Teresa Porter  
Title: Student Attorney  
Employed by or Representing: Turner Environmental Law Clinic  
Signature:   
Date: 1/7/09

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NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before the Licensing Board:

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Dr. James F. Jackson

In the Matter of

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Name (printed): ERICA L. TRITT  
Title: Student Attorney  
Employed by or Representing: Turner Environmental Law Clinic  
Signature: Erica Tritt  
Date: 1/5/09

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
SOUTHERN NUCLEAR OPERATING	)	Docket No. 52-011-ESP
COMPANY	)	
	)	
(Early Site Permit for the Vogtle ESP Site)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing JOINT INTERVENORS' NOTICE OF EXECUTION OF NONDISCLOSURE DECLARATION were served upon the following persons by Electronic Information Exchange and/or electronic mail.

Office of Commission Appellate  
Adjudication  
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Administrative Judge  
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Atomic Safety and Licensing Board Panel  
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ATTN: Docketing and Service  
Mail Stop 0-16C1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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[pbessette@morganlewis.com](mailto:pbessette@morganlewis.com);  
[mfreeze@morganlewis.com](mailto:mfreeze@morganlewis.com))

Dated: January 7, 2009

/signed electronically by/

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Lawrence Sanders