

**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))	January 9, 2009

**SOUTHERN NUCLEAR OPERATING COMPANY'S TESTIMONY OF
ANTHONY DODD AND MATT MONTZ CONCERNING EC 1.2**

Q1. Please state your name(s) and address(es).

A1. My name is Anthony Ray Dodd (ARD). My business address is: 5131 Maner Road, Smyrna, GA 30080.

My name is Matthew Thomas Montz (MTM). My business address is: 42 Inverness Center Parkway, Birmingham, AL 35242.

Q2. Please state your current employer, position, and responsibilities.

A2. (ARD) I am employed by Georgia Power Company as an Environmental Specialist. I accepted this position in August of 2007, and my focus is Fisheries Biology and Aquatic Ecology. In this position, I am responsible for conducting routine monitoring and management of power company resources that involve aquatic biological resources associated with reservoirs of FERC permitted hydroelectric dams and tail waters. I also monitor state waters that may be affected by Company infrastructure development needs. In addition, I manage special projects dealing with issues of assessment of fisheries and other natural resources, including freshwater aquatic macroinvertebrate communities, mussel fauna, and coastal estuarine resources. Specifically, I conduct field investigations

of potential power plant impacts to aquatic resources at fossil fuel and nuclear electric production facilities.

(MTM) I am employed by Southern Nuclear Operating Company as an Environmental Specialist, and I have held this position since November of 2006. In this capacity, I am responsible for responding to NRC technical review staff questions related to the Early Site Permit and Combined Construction and Operating License applications and for completing and submitting the environmental permits required for new plant construction and operation. In addition, I worked with the Nuclear Development Organization in preparing the Environmental Reports for these applications.

Q3. Please describe your education and prior experience.

A3. (ARD) I earned a Bachelor of Science degree in Marine Biology from Troy University. I have over 25 years of experience in the environmental field, specializing in aquatic biology. Prior to joining Georgia Power Company, I worked as a Senior Biologist for Geosyntec Consultants, Inc., from August 2000 to August 2007. In this position, I conducted and supervised fisheries-related investigations in freshwater and estuarine environments throughout various parts of the southeastern United States. I am a licensed State and Federal permit holder for the collection of protected species of freshwater fish species, and I am well-versed in fish collection methodologies, including hydroacoustics sampling, species identification, and quality control and quality assurance measures. During my career, I have held positions as an aquatic ecologist involved primarily in

fisheries investigations with environmental services firms based in Georgia. *See* Exhibit SNC000002 (Anthony R. Dodd Curriculum Vitae).

(MTM) I earned a Bachelor of Science degree in Biology from Samford University and a Master of Science degree in Environmental Management from Samford University. I have over 12 years of experience in the field of environmental biology. Prior to joining Southern Nuclear, I worked as an Environmental Specialist for Southern Company Services, Earth Science and Environmental Engineering from 1999 to 2006. In this position, I managed aquatic environmental monitoring programs for Mississippi and Gulf Power Companies and spent time working in the areas of water chemistry, benthic macro invertebrate studies, and effluent toxicity testing. I also conducted assessments of water quality conditions of southern estuaries and rivers to determine the impacts associated with the withdrawal and discharge of cooling water at seven electric generating facilities in Mississippi and Florida. During my career, I have participated in field collection of air, water, and soil samples, as well as the evaluation of those samples for possible environmental impacts. *See* Exhibit SNC000003 (Matthew T. Montz Curriculum Vitae).

Q4. What is the purpose of your testimony?

A4. (ARD/MTM) The purpose of this testimony is to describe the methods and results of the studies conducted in 2008 on the Savannah River near Plant Vogtle and at the Plant Vogtle Units 1 & 2 intake structure, which were designed to assess aquatic impingement and entrainment, and discharge of the thermal plume.

Q5. Please describe the impingement and entrainment studies.

A5. (ARD/MTM) The impingement and entrainment (“I & E”) studies characterize rates of impingement and entrainment of all detectable life states of fish at Plant Vogtle’s Unit 1 & 2 make-up water intake structure as a means to infer a technically valid assessment of anticipated I & E rates for the similarly designed intake structure for the proposed Plant Vogtle Units 3 & 4. Impinged fishes are those captured and removed from intake water by means of the intake structure traveling screen system, which utilizes 3/8 – inch size mesh metal screening panels. Entrained fishes include early life stages including eggs and larvae of varying stages of development that are entrained through the traveling screens and subsequently entrained through the length of the facility cooling system via intake flows. Mortality of impinged and entrained fishes at Plant Vogtle is assumed to be at the one hundred percent level, consistent with assessment guidance precepts included in Section 316(b) of the Clean Water Act.

The I & E studies are comprised of three primary tasks, including the collection of (1) samples of the ichthyoplankton (fish eggs and larvae) community of the Savannah River (intake source water) upstream and near Plant Vogtle’s intake canal; (2) samples of the entrained (inside the intake canal) ichthyoplankton community; (3) samples of impinged fishes collected by the traveling screen system.

All I & E work to date has been, and is currently being, conducted in a manner of quality assurance in a high standard of care consistent with widely practiced and standard scientific methods.

Q6. What has been your role with respect to conducting the I & E study at Plant Vogtle?

A6. (ARD/MTM) We met and worked together with Nuclear Regulatory Commission staff and Dr. Chuck Coutant to develop the I & E sampling program for the Plant Vogtle make-up water intake structure.

(ARD) With one co-worker, I conducted each of the I & E sampling events and provided taxonomic identifications for the impingement samples. I collected, preserved, handled, and shipped entrainment samples under chain of custody to the contracted taxonomic laboratory. I summarized the methods, interpreted the sampling data, and compiled bi-weekly trip reports to document the progress of the I & E sampling programs.

(MTM) I reviewed and assessed the bi-weekly trip reports to monitor the progress of the I & E sampling programs and also coordinated any support that may be required at the plant while Tony Dodd conducted the sampling.

Q7. Please describe how the process for collecting this I & E data was developed.

A7. (ARD/MTM) This process began with meetings and discussions between Chuck Coutant, Tony Dodd, and Matt Montz. This group developed a study program that is based on similar studies that other plants conducted in order to comply with section 316(b) of the Clean Water Act for existing intake. The general description was recorded by Georgia Power's Environmental Field Services Staff, led by Mr. Tony Dodd. The sampling began on March 10, 2008.

Impingement Monitoring

Q8. Please describe the time frame of the impingement monitoring.

A8. Since March of 2008, Georgia Power Company staff biologists have been conducting bi-weekly impingement sampling at the VEGP cooling water intake structure. The monitoring is currently scheduled to end in February of 2009. This time frame allows for the collection of a representative sample of the potentially impacted fish community. Analysis of the results of a year-long study will encompass seasonal changes in the fish community, such as migratory behavior and peak recruitment.

Q9. **Please explain the process of conducting monitoring events.**

A9. Monitoring events are conducted twice per month, which results in representative, half-monthly samples. Each monitoring event is divided into two 12-hour sample periods, representing “day” and “night” samples. During sampling, the traveling screens and screen wash are run at the beginning of each sampling event, to initially clean the screens of any impinged organisms, and again after the 12-hour day and night samples. A nylon-mesh sample insert net is suspended below the screen wash discharge within the existing steel-frame trash basket to collect all debris from the screens, including any impinged fish. *See* Exhibit SNC000006 (Photo depicting impingement sampling apparatus/insert net as mounted in the screen wash pit). After each 12-hour collection period (or periodically, depending on debris load), the collection basket is removed and screen wash contents are sorted by GPC biologists to identify any impinged fish. Any fish collected are identified to species level, measured and weighed either in the field or at GPC’s lab in Smyrna, Georgia. The results are recorded on data sheets for each 12-hour “day” and “night” period. To date, the information recorded from the field data

sheets has been compiled into a report. [Detailed results of the impingement study are compiled in the Interim Impingement Report.] See Exhibit SNC000004 (Interim Report of Fish Impingement at the Plant Vogtle Electric Generating Plant (January 2009)).

Q10. What is the current status of the collection of impingement data at VEGP?

A10. Impingement monitoring is currently being conducted at VEGP river water intake. As of December 19, 2008, 20 of the 24 planned impingement monitoring events have been completed. The current draft report includes results for those sampling events.

Q11. How many organisms have been collected during the impingement monitoring events?

A11. Through December of 2008, a total of 146 fish, nine crayfish, and two freshwater shrimps have been collected from the Plant Vogtle intake structure.

Q12. What are the conclusions of the impingement report dated January 2009?

A12. The report summarizes results for ten months (March through December) of the 12-month study. The results indicate that the impingement rate is very low and poses an insignificant impact to the Savannah River fishery resource. The ten-month sample is comprised of 19 species of fish and two species of crustaceans representing 10 taxonomic families weighing a total of 865.2 grams (1.9 pounds). Impinged fish species represent eight fish families with Centrarchidae (sunfishes) being the most abundant (58.6 percent by number and 47.5 percent by weight). The most common individual species found during the sampling events include spotted sunfish (38.9 percent), hogchoker (10.8 percent), and white catfish (8.9

percent). These species are common to the region. No State or Federal-listed species were collected.

Most (56.9 percent) of the impinged organisms were collected during night time periods. The rate of impingement exhibited no statistically significant correlation with trends in variation of pumping rate, river stage, water temperature, or local precipitation. When the results are mathematically expanded from single sample event results into half-monthly samples, representative of full-time intake pumping, the cumulative impingement rate over ten months is 1,453 fish weighing approximately 17.3 pounds and 1,941 fish weighing 23.3 pounds at the 95% Upper Confidence Limit. Plant Vogtle's Unit 1 & 2 ten-month impingement mortality effect on the fish population of the Savannah River is likely, highly insignificant even when considering the addition of a second similar intake structure for Vogtle Units 3 & 4.

Entrainment Monitoring

Q13. Please describe the entrainment study at VEGP.

A13. Entrainment monitoring was conducted at the VEGP cooling water intake structure to quantitatively estimate the numbers of ichthyoplankton entrained by cooling water withdrawals. The entrainment study was performed during the spring and early summer (March - July) of 2008. This period was sampled because it represents the most biologically productive time period of the year for fish, when the occurrence of planktonic (drift) fish eggs and larvae is most prevalent in the middle Savannah River. Entrainment sampling was performed once every two weeks from March through July of 2008. The study included

sampling in the Savannah River upstream and beyond the influence of the intake in order to assess population attributes of the site-specific ichthyoplankton community. [Detailed results of the entrainment study are compiled in the Final Entrainment Report.] *See* Exhibit SNC000005 (Entrainment Assessment at the Plant Vogtle Electric Generating Plant (October 2008)).]

Q14. Please describe the process by which the data was collected.

A14. Ichthyoplankton samples taken from the intake canal were collected through the use of submersible pumps. The sample water was pumped through 500-micron mesh-size plankton nets suspended in 55-gallon drums stationed at the top of the intake canal bulkhead. *See* Exhibit SNC000007 (Photo depicting entrainment sampling apparatus mounted at the edge of the intake canal). The target sample volume was between 75m³ (cubic meters) and 100m³ of water. Source water ichthyoplankton samples were also collected with 500-micron mesh size plankton nets, as towed from a boat *See* Exhibit SNC000008 (Photo depicting individual conducting entrainment sampling via boat-mounted plankton net sampler on the Savannah River). Each background sampling station (left bank, center channel, and right bank) was sampled at one-meter depth intervals to the maximum available depth. Total water column sample time averaged about 20 minutes per station event. The mean target sample volume for the background samples was approximately 100m³ of water.

Q15. How was the data analyzed and processed beyond field sampling?

A15. Ichthyoplankton samples from both source water and canal waters were collected at 6-hour intervals and then composited into one 12-hour “day” and one 12-hour

“night” sample. Samples were preserved with 5% formalin, packaged under chain of custody, and shipped to Normandeau & Associates for enumeration and identification down to the lowest practical taxon. Laboratory taxonomic results were forwarded to Georgia Power by the first of September 2008.

As source water and entrainment sampling was conducted from beginning to end of the bulk drift season, that result was assumed to be representative of the annual drift. Several steps were used in the calculation of an annual entrainment rate. Field-sampled organism density collected during each half-monthly sampling event was adjusted by the appropriate multiplier to reflect actual measured daily facility intake volumes. These daily entrainment rates, assumed to be representative of all days occurring between half-monthly sampling events, were summed to yield half-monthly entrainment rates. Half-monthly rates were then summed to yield the annual entrainment rate. The diversity and abundance of species entrained by the intake structure were compared to the numbers and species collected in the Savannah River (upstream of the intake) during the same time period.

Source water data bracketed the beginning and end of the drift season, effectively representing annual entrainment. To calculate the annual entrainment estimate, the daily entrainment rate (number of organisms per 1000 m³) was established based upon the result of each half-monthly entrainment sampling event result from the intake canal. Daily entrainment rates based on entrainment sample volumes were scaled by the appropriate multiplier to reflect actual daily make-up water intake volumes. These daily entrainment rates were then summed to yield

half-monthly entrainment rates. Half-monthly entrainment rates were summed to yield an annual rate.

The diversity and abundance of species entrained by the intake were compared to the numbers and species collected in the Savannah River upstream from the intake during the same time period.

Q16. Why were samples in the Savannah River collected differently from the samples collected in the intake canal?

A16. Different methods were used because the velocities of the water in the intake canal were too low to use a plankton net, as learned during the initial sampling event. The alternative method of pumping entrained water via submersible pump was used to accommodate the prevailing, sluggish hydraulic conditions in the canal, as well as the physical constraints of sampling the canal by boat. [See Exhibit SNC000009 (Photo depicting approach view of the canal and pump house) and Exhibit SNC000010 (Photo depicting view of the outer intake canal at the Savannah River). These photos show views of the intake canal from each end. The scenes capture typical quiescent conditions in the canal encountered during the study owing to prevailing river flows. The emergent sediment catchment sheet piles are visible in both photos.] This includes the bulkhead high side walls and the sheet piling located near the mouth of the canal, which prevented boat access for the purpose of entrainment sampling. Also, due to operations safety and operational concerns, no sampling apparatuses of any kind were permitted behind the traveling screens or inside the inlet conduit.

Q17. How many samples were collected during this period?

A17. A total of thirty-six ichthyoplankton samples were collected during the study period. A total of twenty-five individual specimens comprised of three fish species and four taxonomic families were collected via pumped entrainment samples. The most abundant entrainment sample species was yellow perch (40 percent), while yellow bullhead and pirate perch accounted for 4 percent each. Among the unidentified taxa, members of the Catostomidae (suckers; 20 percent) and Centrarchidae (sunfishes; 16 percent) were the most dominant.

No eggs were observed in the entrainment samples, indicating their likely “settling out” of the water column between the mouth of the canal and the head of the intake structure, due to sediment catchment. The most abundant entrained life stage was post-yolk-sac larvae, which represented sixty-eight percent of the samples. No organisms were collected during two of the nine entrainment sampling events. During the entire entrainment study period, mean per-event egg and larval density was approximately 11.3 organisms per 1000 m³. The estimated daily entrainment rate is 1,302 organisms, while the estimated daily drift rate (source water drift abundance) in the Savannah River is 312,039 organisms. This result indicates that no significant impact is occurring to the Savannah River fishery due to the entrainment effect from Plant Vogtle.

Q18. Does this say anything about the drift community?

A18. Yes. The drift community in the middle Savannah River is comprised of a relatively diverse and abundant species assemblage comprised of eggs and larvae, including migratory species such as herrings and striped bass. The results of this study demonstrate that an insignificant number of organisms are actually being

entrained, as compared to the quantity of organisms that flow past the intake structure on a regular basis and remain directly unaffected by the intake structure.

Q19. What are the conclusions of the Final Entrainment Report dated October 22, 2008?

A19. The results of the study indicate that the entrainment rate at Vogtle Units 1 & 2 is low compared to the abundance of source water egg larval drift in the Savannah River. Entrainment sampling indicated a paucity of organisms in canal intake waters during the season of peak egg and larval abundance in source water. Most entrainment sample organisms were collected at night. The density of entrained organisms was 11.3 organisms per 1000 m³ of intake flow or 1,302 fish eggs and larvae per day for the study period based on actual intake flow.

About 3.4 times more fish species were collected in source water samples than entrainment samples. Most source water sampled eggs and larvae were collected at night time. Peak fish egg and larval abundance in source water was detected between April 23rd and May 8th of 2008. This time period was marked by relatively high numbers of egg, yolk-sac, and post-yolk-sac life stages of Cyprinidae (minnows) and American shad. Empirical observation of river flow vs. source water egg and larval drift during the study period clearly demonstrated an abrupt decline in drift abundance following the end of the elevated springtime flows and the beginning of sustained low summer flows. The density of the source water organisms was calculated at 403.6 organisms per 1000 m³. This resulted in a mathematically expanded drift rate of approximately 312,039

organisms per day, as based upon gauged daily river flows during the study period.

Entrained species were also represented among the list of source water taxa collected. No protected fish species were encountered in source water or entrainment samples.

Plant Vogtle's mean daily make-up water intake pumping flow represents approximately 2.1 percent of the mean daily flow in the Savannah River during the study period.

Hydraulic Zone of Influence Determination

Q20. Please describe any other surveys that were conducted at VEGP.

A20. On May 7, 2008, Southern Company personnel completed a hydraulic zone of influence ("HZI") survey at the existing VEGP intake structure. This survey was requested by Southern Nuclear to complement the I & E surveys. This type of study is typical of the suite of studies performed in association with impingement mortality characterization studies following CWA section 316(b) guidance. The purpose of this survey is to measure the extent of the HZI. This is achieved by measuring and recording deviations in the magnitude, direction, and velocity of river flow, as influenced by intake water withdrawal. The survey result provides an indication of the I & E potential of aquatic organisms near the mouth of the canal.

Q21. What data was collected?

A21. The portion of the Savannah River adjacent to the cooling intake canal was surveyed in both the upstream and downstream direction over a sufficient distance

using a boat-based Acoustic Doppler Current Profiler (“ADCP”). ADCP data (broad-band acoustic echo information) was collected by navigating the boat parallel to the shoreline, which resulted in defining the maximum extent of hydraulic influence by intake withdrawal. The first ADCP transect was established within ten feet of the intake canal. Ten other transects were sequentially placed at ten-foot intervals away from the intake canal ending at mid-channel. The boundary demarcating the area of greatest extent of hydraulic influence from VEGP was determined when the occurrence of water velocities and vectors were unrelated to the VEGP intake structure.

Q22. Please describe the conditions of that survey.

A22. During typical cooling operations, two of the four available cooling water intake pumps are in operation. When the ADCP survey was conducted, three cooling water intake pumps were operating. During the May 7, 2008 survey, the intake flow was calculated at 71.2 MGD, or 110 cfs (56% of full capacity). Additionally, at the time the survey was conducted, the average flow on the Savannah River was 4,482 cfs. A total of six transects were performed to measure and document the Savannah River flow (three prior to the survey and three after the survey). The river flows varied by less than two percent (4,443 – 4,506 cfs) during the monitoring event.

Q23. Please state the findings regarding the area of hydraulic influence on the Savannah River.

A23. Based on the intake and Savannah River flows during the May 7, 2008 survey, the VEGP zone of hydraulic influence occupied an area of 1.10 acres, which includes

the entire VEGP intake canal and a small portion of the Savannah River. The portion of the HZI extending into the Savannah River beyond the mouth of the canal accounted for 0.14 acres (or about 13 percent) of the total HZI. Therefore, the HZI was only detectable in the river out to a distance of approximately 50 feet from the mouth of the intake canal (or about 13 percent of the total distance across the river channel and proximal to the mouth of the canal).

Thermal Plume

Q24. Were any measurements made to characterize the thermal plume?

A24. Yes. GPC and APC staff members recorded measurements in the river at, and in the vicinity of, the VEGP discharge pipe with a combination of gear types.

Q25. What was the purpose of this study?

A25. The purpose of this study was to map the physical size of the VEGP's thermal discharge plume via high resolution hydraulic measurements as well as its temperature characteristics, via high resolution, under typical cooling tower operations with Units 1 and 2 in operation and during a period of stable river flow/stage conditions. The mapping result was compared with the existing CORMIX model representation for validation.

Q26. Please explain this process.

A26. Two gear types, deployed by boat, were used to record water temperatures and ADCP acoustically derived data to develop a three-dimensional ("3-D") computer model of the thermal plume.

A calibrated Hydrolab Surveyor (multi-array water quality analyzer instrument) was used to record water temperature at half-meter depth increments, at several

locations (vertical water column profiles) placed along seven transects that mark and bracket the area of the thermal discharge. In the Savannah River, two ambient (background) transects were located upstream of the discharge; whereas, each included five vertical profile locations representing near left bank (facing upstream), one-quarter distance out from left bank, at mid-channel, one-quarter distance from right bank, and near the right bank. The five remaining transects positioned at, and downstream of, the discharge pipe included one additional vertical profile at approximately 1/8 of the distance out from the left bank.

An ADCP was deployed in the same area as thermal transects and along more (24 vs. 7) transects placed on and between the temperature transects to measure the size of the plume in high detail based on acoustically derived hydraulic measurements.

Both ADCP and water temperature data were electronically synthesized with a 3-D computer model to graphically illustrate the spatial effects of hydraulics and temperature characteristics of the thermal plume.

Q27. What data was collected?

A27. High resolution temperature data (degrees Celsius) was collected from a total of 40 vertical profiles along the seven established transects and electronically recorded.

The ADCP data was collected continuously from the 24 cross-sectional transects. This electronically recorded data consisted of complete river channel profiles of digitized, broad-band acoustic echo information containing details of magnitude,

direction, and velocity of water column currents enabling hydraulic demarcation of the thermal plume.

Q28. How was this data analyzed?

A28. Temperature and ADCP data were entered and processed in SURFER software (version 8.03), which can produce two or three-dimensional illustrations. Color-coded contour maps (in 0.5 meter layers) of water temperature were created using a geo-statistical gridding method (kriging) to mathematically interpolate quantitative information for unknown geographical points positioned between geographically known points of information (calculation of gradients), resulting in a smooth contour map. The depth averaged water current vector data generated by the ADCP was also processed in SURFER and gridded separately to complement the temperature model in the form of a smooth, color-coded contour map depicting the shape and size of the thermal plume. The models/graphics provided information that visually differentiated discharge-associated temperatures from ambient river temperatures as well as the shape and size of the thermal plume. *See Exhibit SNC000011 (Images from Thermal Study depicting river water temperature).*

Q29. Please describe the results of this measurement.

A29. The temperature resulting from the thermal discharge (sourced at the cooling tower basins) accounts for a temperature differential very similar (less than one degree Celsius) from prevailing ambient river temperatures. It is significant that ambient temperatures, measured in a large area (2,400 feet in length) on the opposite of the river and including a point located upstream of the discharge, were

as warm or warmer than water temperatures associated with the thermal discharge itself. Overall, the result indicated that the warmest water in the study area occurred at the river surface along the far shoreline likely due to solar radiation. The data indicated that the thermal discharge plume occupies a small zone (approximately 100 feet long by 75 feet wide) located immediately downstream of the discharge pipe/outfall.

Depth averaged water velocity data delineated an area with water velocities higher than the ambient river velocity located immediately downstream of the outfall. Further downstream, beyond the discharge outfall, three localized areas of river occurring at approximately 250, 700, and 1000 feet were characterized by currents occurring at velocities swifter (about 0.7 feet/second faster) than ambient river water. The overall study result indicated the presence of a relatively small zone of detectable difference between discharge and ambient temperatures with observable indications of hydraulic effect and ultimate mixing between the discharge and ambient water column hydraulics at distances much greater downstream from the outfall than detected by temperature alone.

Q30. Are true, accurate and correct copies of each of the reports heretofore referenced in your testimony attached to this pre-filed written testimony, and do they accurately portray the facts they purport to portray?

A30. Yes.

Q31. Are true, accurate and correct copies of each of the photos heretofore referenced in your testimony attached to this pre-filed written testimony, and do they accurately portray the facts they purport to portray?

A31. Yes.

Q32. Does this conclude your testimony?

A32. Yes.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

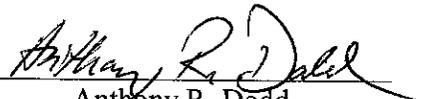
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket No. 52-011-ESP
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Southern Nuclear Operating Company)	ASLBP No. 07-850-01- ESP-BD01
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(Early Site Permit for Vogtle ESP Site))	January 9, 2009

AFFIDAVIT OF ANTHONY R. DODD IN SUPPORT OF SOUTHERN NUCLEAR'S
PRE-FILED TESTIMONY ON ENVIRONMENTAL CONTENTION 1.2

I, Anthony R. Dodd, do hereby state as follows:

1. I am employed by Georgia Power Company as an Environmental Specialist. A statement of my professional qualifications is attached to the SNC pre-filed testimony to be submitted on January 9, 2009, in response to hearing issues identified by the Board.
2. I have read the foregoing prepared testimony regarding environmental matters at the Plant Vogtle Site.
3. I attest to the accuracy of those statements, support them as my own, and endorse their introduction into the record of this proceeding. I declare under penalty of perjury that those statements, and my statements in this affidavit, are true and correct to the best of my knowledge, information and belief.



Anthony R. Dodd

Subscribed and sworn to before me
this 09th day of January, 2009.



Notary Public

Notary Public, Burke County, Georgia
My Commission Expires November 11, 2011

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

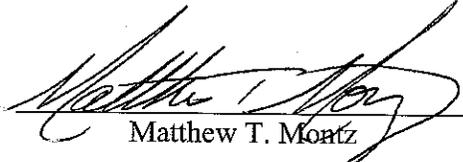
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Southern Nuclear Operating Company)	ASLBP No. 07-850-01- ESP-BD01
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(Early Site Permit for Vogtle ESP Site))	January 9, 2009

AFFIDAVIT OF MATTHEW T. MONTZ IN SUPPORT OF SOUTHERN NUCLEAR'S
PRE-FILED TESTIMONY ON ENVIRONMENTAL CONTENTION 1.2

I, Matthew T. Montz, do hereby state as follows:

1. I am employed by Southern Nuclear Operating Company as an Environmental Specialist. A statement of my professional qualifications is attached to the SNC pre-filed testimony to be submitted on January 9, 2009, in response to hearing issues identified by the Board.
2. I have read the foregoing prepared testimony regarding environmental matters at the Plant Vogtle Site.
3. I attest to the accuracy of those statements, support them as my own, and endorse their introduction into the record of this proceeding. I declare under penalty of perjury that those statements, and my statements in this affidavit, are true and correct to the best of my knowledge, information and belief.


Matthew T. Montz

Subscribed and sworn to before me
this 5th day of January, 2009.


Valerie A. Brue
Notary Public

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Apr 28, 2011
BONDED THRU NOTARY PUBLIC UNDERWRITERS