



BALCH & BINGHAM LLP

Alabama • Georgia • Mississippi • Washington, DC

K.C. Hairston
(205) 226-3435

Attorneys and Counselors
1710 Sixth Avenue North
P.O. Box 306 (35201-0306)
Birmingham, AL 35203-2015
(205) 251-8100
(205) 226-8798 Fax
www.balch.com

(205) 488-5862 (direct fax)
kchairston@balch.com

March 11, 2009

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: Twenty-Fourth 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 twenty-fourth 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

<hr/>)	
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))	March 9, 2009
<hr/>)	

CERTIFICATION OF THE TWENTY FOURTH SUPPLEMENTAL
DISCLOSURES 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 Twenty Fourth 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

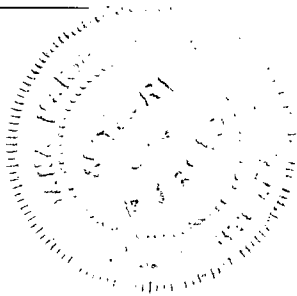
available to and under the possession, custody, or control (including its applicable affiliates and contractors) of Southern Nuclear. Further, to the best of my knowledge, information and belief, and based on the review of information and documentation currently reasonably available to and under the 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 9th day of March, 2009



Dana M. Williams

NOTARY PUBLIC

My Commission Expires

Document No.	Beginning Bates	Ending Bates	Document Name	Document Date	Source	Document Type	Proprietary
SNC830	TBD	TBD	Trip Report 23	3/2/2009	Georgia Power Company	Report	
SNC831	TBD	TBD	Trip Report 24	3/2/2009	Georgia Power Company	Report	
SNC832	TBD	TBD	E-mail from Jim Candler to Tom Moorer regarding GIS coverage of proposed dredging reaches.	3/2/2009	Georgia Power Company	E-mail	
SNC833	TBD	TBD	E-mail from Jessica Joyner to Tony Dodd regarding December withdrawal rates and attached Monthly Water Withdrawal Report.	3/2/2009	SNC	E-mail	
SNC834	TBD	TBD	E-mail from Tony Dodd to Kenneth Middlebrooks, et al. regarding River Intake Sampling.	2/23/2009	Georgia Power Company	E-mail	
SNC835	TBD	TBD	E-mail from Tony Dodd to Matt Montz, et al. regarding postponed sampling.	2/12/2009	Georgia Power Company	E-mail	
SNC836	TBD	TBD	E-mail from Jessica Joyner to Tony Dodd regarding January withdrawal rates and attached Monthly Water Withdrawal Report.	3/2/2009	Georgia Power Company	E-mail	
SNC837	TBD	TBD	E-mail from Jeff Neubert to Frank Gill regarding barge and rail transportation.	1/30/2009	Westinghouse	E-mail	