

Southern Nuclear Operating Company

Vogle Early Site Permit Application

Part 1

Administrative Information

Revision 5

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Part 1 ADMINISTRATIVE INFORMATION

Chapter 1 Introduction

1.1 Introduction

Southern Nuclear Operating Company (Southern Nuclear or SNC), acting on behalf of itself and the owners of the Vogtle Electric Generating Plant (VEGP) site, identified below, hereby submits this application for an Early Site Permit (ESP) for two additional reactors at the VEGP site near Waynesboro, Georgia. This application is submitted in accordance with Title 10 of the Code of Federal Regulations, Part 52 (10 CFR 52), Subpart A – Early Site Permits. SNC requests that the NRC issue an ESP for the VEGP site described in this application for a period of 20 years from the date of issuance. The information presented in this application supports issuance of this permit.

The 3,169-acre VEGP site is located on a coastal plain bluff on the southwest side of the Savannah River in eastern Burke County Georgia. The site is approximately 30 river miles above the U.S. 301 bridge and directly across the river from the Department of Energy's Savannah River Site (Barnwell County, South Carolina). The VEGP site is owned by Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and the City of Dalton, Georgia, an incorporated municipality in the State of Georgia acting by and through its Board of Water, Light and Sinking Fund Commissioners ('Dalton Utilities'). These VEGP site owners are herein referred to as the owners.

ESP application, Part 2, Chapter 1 provides a more detailed description of the VEGP site.

Locating proposed additional nuclear units on an existing nuclear plant site will be beneficial because this existing site already has an infrastructure in-place to support nuclear power generation. Other key advantages of locating additional nuclear units at the VEGP site are as follows:

- Existing VEGP Units 1 and 2 site related analysis and operating records were available as inputs for development of various sections of this ESP application.
- The VEGP site and its exclusion area previously underwent a screening and evaluation process establishing its suitability, including a National Environmental Policy Act (NEPA) evaluation of alternatives. The proposed additional nuclear units are located within the existing VEGP site exclusion area boundary (site property boundary).
- Programs, procedures, and arrangements have been established, and are in-place, with State and local government agencies, covering emergency planning, discharge permits, etc.
- Liaisons with the local community are already established.

SNC is the licensed operator of the existing generating facilities at the VEGP site, with control of the existing facilities, including complete authority to regulate any and all access and activity

within the plant exclusion area boundary, and authority to act as the agent of the site owners. SNC has been authorized by GPC, acting as agent for the other owners (also known as co-owners) of the existing VEGP, to apply for an ESP for the VEGP site.

1.2 Purpose of an Early Site Permit Application

Obtaining a license for a nuclear power plant in the United States has traditionally been a two-step process as set forth in Title 10 of the Code of Federal Regulations, Part 50 (10 CFR 50), Domestic licensing of production and utilization facilities, which requires the NRC to first issue a construction permit, and later, an operating license. In 1989, the NRC established an alternative licensing process which combines the construction permit and operating license, with certain conditions, into a single combined license (or “COL”). This new process is set forth in 10 CFR 52. Other provisions of 10 CFR 52 include the ESP, which allows an applicant to obtain approval for a site for a nuclear power plant, prior to a decision to construct, and “bank” it for future use, and the certified standard plant design, which can be used by an applicant as an “off-the-shelf” power plant design pre-approved by the NRC.

Under 10 CFR 52, an ESP application can be approved separate from any other NRC licensing action. Such permits are typically valid for a period of ten to twenty years with provisions for renewal.

Site safety issues, environmental issues, and certain aspects of emergency preparedness are addressed as part of the ESP process. ESP licensing issues are resolved with finality during the ESP review process and are not re-examined in any subsequent licensing action involving the permitted site, absent any information meeting certain standards established by the NRC.

1.3 Contact Information

Any notices, questions, or correspondence in connection with this filing should be directed to:

Mr. J. A. “Buzz” Miller
Senior Vice President – Nuclear Development
Southern Nuclear Operating Company
40 Inverness Center Parkway
P. O. Box 1295
Birmingham, AL 35201-1295, with copies to:

Mr. O. C. Harper IV
Vice President - Resource Planning and Nuclear Development
Georgia Power Company
241 Ralph McGill Boulevard NE
Atlanta, GA 30308

Mr. Stanford M. Blanton, esq.
Balch and Bingham
P. O. Box 306
Birmingham, AL 35201

Mr. C. R. Pierce
Southern Nuclear Operating Company
40 Inverness Center Parkway
P. O. Box 1295
Birmingham, AL 35201-1295

Chapter 2 Early Site Permit Application Format and Content

2.1 Format and Content

This application contains the information required by 10 CFR Part 52.17, Contents of applications, for an ESP, and is submitted in accordance with NRC guidance on electronic submittals.

The application is organized as follows:

Part 1 – Administrative Information. This part contains an overview of the ESP application and general corporate information, including ownership, management, and boards of directors, as required by 10 CFR 50.33(a) through (d).

Part 2 – Site Safety Analysis Report (SSAR). This part contains information about site safety, emergency preparedness, and quality assurance. The site safety section includes a description of the VEGP site and proposed facilities, as required by 10 CFR 52.17(a)(1)(i) through (viii), an assessment of the site features affecting the facility design (e.g., major structures, systems, and components that bear significantly on site acceptability under the radiological consequence evaluation factors of 10 CFR 50.34(a)(1)), and meteorological, hydrologic, geologic, and seismic characteristics of the site. The described seismic characteristics demonstrate site compliance with the earthquake engineering criteria of 10 CFR 50, Appendix S, as required by 10 CFR 50.34(a)(12) and (b)(10). Also included is a demonstration of site compliance with 10 CFR 100, Reactor Site Criteria, requirements for site suitability. Regarding the description of the facilities for which the proposed site may be used, SNC has selected two Westinghouse Electric Company, LLC (Westinghouse) AP1000 standard reactors as the proposed design for the VEGP site. This part also discusses the capability of the facilities to withstand the natural and man-made environmental hazards of the site. The emergency preparedness information includes an assessment of any impediments to implementing an emergency plan at the ESP site, as required by 10 CFR 52.17(b)(1), and includes a complete and integrated emergency plan, as required by 10 CFR 52.17(b)(2), with inspections, tests, and acceptance criteria (ITAAC). The quality assurance program under which ESP-related activities have been performed is also provided. Where possible, the SSAR section numbers correspond to the section numbers identified in NRC Review Standard RS-002, *Processing Applications for Early Site Permits* guidance. Consistent with that guidance, there are some gaps in the numbering sequence. This is intentional. Also, in a few instances, information has been located elsewhere in the application because it was deemed more appropriate for ESP purposes. However, to the extent practical, the numbering sequence in this ESP application has been maintained consistent with NRC guidance. This approach is intended to facilitate any subsequent integration of the information in this ESP application with the Westinghouse AP1000 design certification in the COL application, in which the complete numbering sequence would be used.

The regulatory bases for the SSAR include consideration of the following:

- NRC Regulations – 10 CFR 50, 10 CFR 52 and 10 CFR 100.
- NRC Regulatory Guide 1.70, *Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants*.
- NUREG-0800, *Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants*

The following briefly describes the individual chapters of the SSAR:

- Chapter 1, Introduction and Description of Proposed Facility, includes an overview of the site and a discussion of development of the SNC Site Characteristic – Design Parameter Approach for the Westinghouse AP1000 standard reactor design.
- Chapter 2, Site Characteristics, includes geography and demography; nearby industrial, transportation, and military facilities; meteorology; hydrology engineering; and geology, seismology and geotechnical engineering.
- Chapter 3, Design of Structures, Components, Equipment, and Systems, includes information on aircraft hazards and Category I structure foundation work for a Limited Work Authorization (LWA).
- Chapter 11, Radioactive Waste Management, includes information on liquid and gaseous radioactive releases.
- Chapter 13, Emergency Planning & Industrial Security, includes an overview of emergency planning for the site and surrounding area in case of plant accidents, of the physical security provided for the site and plant sensitive areas, and of the fitness for duty (FFD) program during plant construction.
- Chapter 15, Site Safety Assessment, includes a discussion of radiological consequences of plant accidents, and conformance with applicable 10 CFR 100 siting criteria.
- Chapter 17, Quality Assurance, includes the Quality Assurance Program (QAP) under which the ESP application has been prepared. The QAP also addresses ESP activities prior to Combined License (COL) receipt, such as site preparation, earthwork, preconstruction activities, and procurement.

Part 3 – Environmental Report (ER). This part contains information about site environmental issues, as required by 10 CFR 51.45 and 51.50. This part also satisfies the application content requirement of 10 CFR 52.17(a)(2). It focuses on the environmental impacts to the VEGP site from the construction and operation of two Westinghouse AP1000 (AP1000) standard reactor plants having characteristics identified in the ER.

This ESP application is premised on the assumption that SNC ultimately seeks a COL to construct and operate the new AP1000 units at the VEGP site. The ER discusses the existing environment surrounding the VEGP site and in the vicinity of the site; postulates environmental

impacts of construction and operation, and considers appropriate mitigation measures; reviews the impacts of design basis and severe accidents; and reviews similar alternative sites.

For evaluation purposes, the following categories of information regarding interfaces of the proposed site and facilities are reviewed:

- Comparison of the functional operational needs of the facility as they relate to the site's natural and environmental resources.
- Impact of the facility on the site's natural and environmental resources.

Input to the ER includes:

- National Environmental Policy Act.
- NRC Regulations – 10 CFR 51 and 10 CFR 52.
- NRC Regulatory Guide 4.2, *Preparation of Environmental Reports for Nuclear Power Stations*.
- NUREG-1555, *Standard Review Plans for Environmental Reviews of Nuclear Power Plants*.
- State environmental statutes, as applicable.

The following briefly describes the sections of the ER:

- Chapter 1, Introduction to the Environmental Report, includes a discussion of the proposed project and SNC's purpose for the permit.
- Chapter 2, Environmental Description, examines the existing use of the site for the VEGP Units 1 and 2 facilities, describes the current site and surrounding area, physical and ecological environment, and provides current socioeconomic, demographic, historic, and community characteristics.
- Chapter 3, Plant Description, describes the new AP1000 facilities proposed for the site and related construction activities.
- Chapter 4, Environmental Impacts of Construction, describes the potential impacts on the surrounding environment for construction of the proposed facilities.
- Chapter 5, Environmental Impacts of Station Operation, describes the potential impacts of operating the proposed facilities at the site.
- Chapter 6, Environmental Measurements and Monitoring Programs, describes the programs that will be utilized to monitor the environmental impacts of the construction and operation of the proposed facility.
- Chapter 7, Environmental Impacts of Postulated Accidents Involving Radioactive Materials, describes the potential radiological consequences, associated with operating the proposed AP1000 facilities at the VEGP site, due to design basis accidents and other severe accidents.
- Chapter 8, Need for Power, provides a need for power evaluation based on the State of Georgia Integrated Resource Plan.

- Chapter 9, Alternatives to the Proposed Action, reviews potential alternatives (including alternative energy sources and sites) and supports the decision for co-locating the proposed AP1000 units at the VEGP site.
- Chapter 10, Environmental Consequences of the Proposed Action, analyzes unavoidable adverse environmental impacts, irreversible commitments of environmental resources, cumulative impacts, and costs and benefits associated with construction and operation of the proposed AP1000 units at the VEGP site.

Due to NRC issuance of the Draft Environmental Impact Statement for an ESP at the VEGP site (**NRC 2007**), the ER is ‘frozen’ at the same revision levels that existed when Revision 2 to the ESP application was submitted and will not be revised any further.

Part 4 – Site Redress Plan. This part contains information regarding site redress as required by 10 CFR 52.17(c). Site redress describes the actions that would be taken by SNC to ensure that the VEGP site is restored to an environmentally stable and aesthetically acceptable condition if certain limited construction activities are conducted and SNC chooses to terminate construction of VEGP Units 3 and 4.

Part 5 – Emergency Plan (EP). This part contains the VEGP Emergency Plan. This emergency plan is applicable to existing VEGP Units 1 and 2, as well as to the proposed new AP1000 units. The VEGP Emergency Plan is designed to be compliant with 10 CFR 50.47, *Emergency plans* and 10 CFR 50 Appendix E, *Emergency Planning and Preparedness for Production and Utilization Facilities*. It is based on the guidance contained in NUREG 0654, Revision 1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, with the exception of emergency action levels which are based on Nuclear Energy Institute (NEI) guidance (**NEI 2007**). In addition, for the new AP1000 units, the VEGP Emergency Plan is designed to be compliant with 10 CFR 52.17(b)(1), 10 CFR 52.17(b)(2)(ii), and 10 CFR 52.17(b)(3). NUREG 0654, Supplement 2 is also used as guidance for the development of the VEGP Emergency Plan pertaining to the new AP1000 units for the ESP process.

In summary, each part of the application is intended to stand alone to the extent practical. That is, information appearing within one part may be referenced elsewhere within the same part to minimize duplication. However, if the same information is used in more than one part, that information may be replicated so that each part may be used without reliance on another part.

2.2 Labeling Conventions

Each page of this application, except pages in the application title sheet, individual Part title sheets, overall application Table of Contents and application Appendices, has a header and footer that identifies the Part of this application to which it belongs and the current revision. Other content identity is established as described in the following sections. However, documents provided as application section appendices (Part 2 – Sections 2.5, 13.3, 13.7, and 17.1) and the Emergency Plan (Part 5) are independent documents issued separately from the application. Therefore, these portions of the application do not fully adhere to the following content requirements.

2.2.1 Pagination

Content pages are numbered to indicate their Chapter and Section, and page within a section. For example, page 3.2-36 is the 36th page in Chapter 3, Section 3.2. Tables and figures located at the end of a Section are similarly numbered with Section page numbers. In addition, each ESP application Part contains a Table of Contents. Table of Contents page numbers are sequentially numbered i, ii, etc. Page numbers are located in the footer of page.

2.2.2 Paragraph Numbering

Within each Part, chapters are numbered sequentially. Subtier content is numbered based on the chapter number. For example, Chapter 2, Section 2.1, Section 2.1.1, etc. References to sections are within a Part unless otherwise specified. Section, and subsection numbers of three or less, are indicated in the Table of Contents for the application Part.

2.2.3 References

Reference lists appear at the end of each Section (i.e., the first subdivision within chapters). For example, the References list for Part 3, Section 2.5 appears at the end of Section 2.5. Some chapters with small sections may include the references at the end of the chapter as a separate heading with each sections references noted. In general NRC Regulations (i.e., Code of Federal Regulations, NUREGs, Regulatory Guides, etc.) are not included in the reference list.

2.2.4 Tables and Figures

Table and figure numbers consist of the Section number, and a sequential number. For example, Figure 2.3-10 is the 10th figure for Section 2.3. Tables (generally) and Figures are located at the end of the associated Section. However, small tables less than one-third of a page may be placed within the text portion of the Section.

2.2.5 Document Revision Level

With the exception of Part 3 (ER), the application's current revision level is denoted in the footer of the application pages. Part 3 is considered a 'frozen' document, due to the issuance of the Draft Environmental Impact Statement for an ESP at the VEGP site (**NRC 2007**), and will no longer be revised. Part 3 footer denotes Revision 2 and change bars have been removed. The remaining application pages have the current revision level denoted even when no changes have occurred on a page from the previous revision(s). Information in Chapters, Sections, or Appendices that has been revised for the current revision is identified by change bars in the right-hand margin of the page.

Chapter 2 References:

(NEI 2007) NEI 07-01, *Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors*, Revision 0, Nuclear Energy Institute, September 2007.

(NRC 2007) NUREG-1872, *Draft Environmental Impact Statement for an Early Site Permit (ESP) at the Vogtle Electric Generating Plant Site*, U.S. Nuclear Regulatory Commission, September 2007.

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Chapter 3 General Information – 10 CFR 50.33

3.1 Names of Applicant and Owners

SNC, as authorized by Georgia Power Company, submits this application individually, and for the owner licensees to be named on the ESP. The names of the applicant and owner licensees are as follows:

- Georgia Power Company
- Oglethorpe Power Corporation (An Electric Membership Corporation)
- Municipal Electric Authority of Georgia
- The City of Dalton, Georgia, an incorporated municipality in the State of Georgia acting by and through its Board of Water, Light and Sinking Fund Commissioners ('Dalton Utilities')
- Southern Nuclear Operating Company, Inc. (non-owner applicant)

3.2 Addresses of Applicant and Owners

Southern Nuclear Operating Company, Inc.
40 Inverness Center Parkway
P. O. Box 1295
Birmingham, AL 35201-1295

Georgia Power Company
241 Ralph McGill Boulevard
Atlanta, GA 30308

Oglethorpe Power Corporation (An Electric Membership Corporation)
2100 East Exchange Place
Tucker, GA 30084-5336

Municipal Electric Authority of Georgia
1470 Riveredge Parkway, NW
Atlanta, GA 30328

Dalton Utilities
1200 V. D. Parrott, Jr. Parkway
Dalton, GA 30720

3.3 Descriptions of Business or Occupation of Applicant and Owners

Southern Nuclear Operating Company, Inc. (Non-Owner Applicant)

SNC is engaged in the operation of nuclear power plants. SNC operates the Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, and the Vogtle Electric Generating Plant (VEGP), Units 1 and 2, for Georgia Power Company (GPC), Oglethorpe Power Corporation (OPC), the Municipal Electric Authority of Georgia (MEAG), and the City of Dalton Georgia (i.e., Dalton Utilities) (the owners); and the Joseph M. Farley Nuclear Plant (FNP) for Alabama Power Company. The combined electric generation of the three plants is in excess of 5,900 MW.

Should a nuclear facility be constructed at the site proposed by this application, SNC is expected to be the exclusive licensed operator of the facility.

Georgia Power Company (Owner)

GPC is engaged in the generation and transmission of electricity and the distribution and sale of such electricity within the State of Georgia. GPC serves more than two million customers in a service area of approximately 57,000 square miles of the State of Georgia's land area. With a rated capability of approximately 14,000 megawatts (MWs), GPC currently provides retail electric service in all but four of Georgia's 159 counties. Should a nuclear facility be constructed at the site proposed by this application, GPC is expected to be named on the operating license as an owner.

Oglethorpe Power Corporation (Owner)

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), supplies electricity at wholesale to 38 Electric Membership Corporations (EMCs) in the State of Georgia, which in turn distribute this electricity at retail to their residential, commercial and industrial customers. The EMCs serve approximately 1.6 million electric consumers (meters) representing approximately four million people of the nine million total residents in the State of Georgia. The EMCs serve consumers in 150 of the 159 counties in Georgia. Should a nuclear facility be constructed at the site proposed by this application, OPC is expected to be named on the operating license as an owner.

Municipal Electric Authority of Georgia (Owner)

Municipal Electric Authority of Georgia (MEAG) is an electric generation and transmission public corporation, which provides wholesale power to 49 communities in the State of Georgia and other wholesale customers. These communities, in turn, supply electricity to approximately 308,000 retail accounts, representing a total population of approximately 614,000, in their respective service areas across the state. Should a nuclear facility be constructed at the site proposed by this application, MEAG is expected to be named on the operating license as an owner.

City of Dalton (Owner)

The City of Dalton (Dalton) is a municipality within the State of Georgia. Acting by and through its Board of Water, Light and Sinking Fund Commissioners, doing business as Dalton Utilities, Dalton owns electric generation capacity, transmission capacity and a distribution system. Dalton is a duly incorporated municipality under the laws of the State of Georgia. Should a nuclear facility be constructed at the site proposed by this application, Dalton is expected to be named on the operating license as an owner.

3.4 Descriptions of Organization and Management of Applicant and Owners

Southern Nuclear Operating Company, Inc.

SNC is a wholly-owned subsidiary of Southern Company, a Delaware corporation registered under the Public Utility Holding Company Act of 1935, having its principal place of business in Atlanta, Georgia. SNC was formed for the purpose of operating nuclear facilities owned by its subsidiaries. Traditional operating companies that are subsidiaries of Southern Company are Georgia Power Company, Alabama Power Company, Gulf Power Company, and Mississippi Power Company. Other subsidiaries of the Southern Company system are Southern Company Services, Inc. a wholly-owned system service organization; Southern LINC, a wholly-owned company providing wireless communications to the Southern Company system and to other businesses in Southern Company's service area; and Southern Telecom, Inc, a wholly-owned company providing fiber optic communications to the Southern Company system and to other businesses in Southern Company's service area.

The traditional service area of Southern Company includes Alabama, Georgia, and significant areas of Mississippi and Florida. Southern Company power plants have a total installed generating capacity of nearly 40,000 MW as of January 1, 2006.

Neither SNC, nor its parent, Southern Company, is owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government. SNC files this application on its own behalf and as agent of the owners.

The names and business addresses of SNC's directors and principal officers, all of whom are citizens of the United States, are as follows:

SNC Directors

D. M. Ratcliffe
President and Chief Operating Officer
Southern Company
30 Ivan Allen Jr. Blvd NW
Atlanta, GA 30308

M. D. Garrett
President and Chief Executive Officer
Georgia Power Company
241 Ralph McGill Boulevard NE
Atlanta, GA 30308

C. D. McCrary
President and Chief Executive Officer
Alabama Power Company
600 North 18th Street
Birmingham, AL 35202

SNC Directors (cont'd)

J. H. Miller, III
President and Chief Executive Officer
Southern Nuclear Operating Company, Inc.
40 Inverness Center Parkway
P. O. Box 1295
Birmingham, AL 35201

SNC Principal Officers

(All addressed at SNC Headquarters in Birmingham, Alabama except the Site Vice Presidents)

J. H. Miller, III
President and Chief Executive Officer

J. T. Gasser
Executive Vice President

J. A. "Buzz" Miller
Senior Vice President, Nuclear Development

L. M. Stinson
Vice President, Fleet Operations Support

M. M. Caston
Vice President and Corporate Counsel

C. W. Brakefield
Comptroller and Treasurer

D. H. Jones
Vice President, Engineering

T. E. Tynan
Vice President – Vogtle
Vogtle Electric Generating Plant
7821 River Road
Waynesboro, GA 30830

J. R. "Randy" Johnson
Vice President - Farley
Farley Nuclear Plant
P.O. Drawer 470
Ashford, AL 36312

SNC Principal Officers (cont'd)

D. R. Madison
Vice President – Hatch
Southern Nuclear Operating Company, Inc.
11028 Hatch Parkway, North
Baxley, GA 31513

Georgia Power Company

GPC is a Georgia corporation with its principal office in Atlanta, Georgia. GPC is a wholly owned subsidiary of Southern Company, a Delaware corporation with its principal office in Atlanta, Georgia.

Neither GPC nor its corporate parent, Southern Company, is owned, controlled, or dominated by an alien, foreign corporation, or foreign government.

The names and business addresses of Georgia Power Company's directors and principal officers, all of whom are citizens of the United States, are as follows:

GPC Directors

Robert L. Brown, Jr.
250 East Ponce De Leon Avenue
Decatur, GA 30030

Anna R. Cablik
1513 Johnson Ferry Road, Suite T-20
Marietta, GA 30062

Michael D. Garrett
241 Ralph McGill Boulevard NE
Atlanta, GA 30308

Stephen S. Green
P.O. Box 10143
Savannah, GA 31412

David M. Ratcliffe
30 Ivan Allen Jr. Blvd NW
Atlanta, GA 30308

Jimmy C. Tallent
63 Highway 515
Blairsville, GA 30512

Beverly Daniel Tatum
350 Spelman Lane SW
Atlanta, GA 30314

GPC Directors (cont'd)

D. Gary Thompson
4020 Powers Ferry Road
Atlanta, GA 30342

Richard W. Ussery
P.O. Box 1360
Fortson, GA 31808

William Jerry Vereen
301 Riverside Drive
Moultrie, GA 31768-8603

E. Jenner Wood, III
P.O. Box 4418, MC0103
Atlanta, GA 30302-4418

GPC Principal Officers

(All addressed at GPC Headquarters in Atlanta, Georgia)

Michael D. Garrett
President and Chief Executive Officer

Cliff S. Thrasher
Executive Vice President, Treasurer and Chief Financial Officer

Ann P. Daiss
Vice President, Comptroller and Chief Accounting Officer

Chris C. Womack
Executive Vice President, External Affairs

Mickey A. Brown
Executive Vice President, Customer Service Organization

Thomas P. Bishop
Senior Vice President and General Counsel

Judy M. Anderson
Senior Vice President, Charitable Giving

Douglas E. Jones
Senior Vice President, Fossil & Hydro Generation

Oscar C. Harper IV
Vice President, Resource Planning and Nuclear Development

Oglethorpe Power Corporation

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) was organized under the Georgia Electric Membership Corporation Act (Official Code of Georgia Annotated, Title 46, Chapter 3, Article 4) and operates on a not-for-profit basis.

OPC is neither owned, controlled nor dominated by an alien, foreign corporation or foreign government.

The names and addresses of OPC's principal officers and the members of its governing body, all of whom are citizens of the United States, are as follows:

OPC Directors

(All addressed at OPC Headquarters in Tucker, Georgia)

Benny W. Denham
Chairman

Sam Rabun
Vice Chairman

Marshall S. Millwood
Director

Larry N. Chadwick
Director

M. Anthony Ham
Director

H. B. "Bud" Wiley Jr.
Director

Gary A. Miller
Director

Jeffrey W. Murphy
Director

C. Hill Bentley
Director

Gary W. Wyatt
Director

Wm. Ronald Duffey
Director

OPC Directors (cont'd)

Bobby C. Smith, Jr.
Director

Rick L. Gaston
Director

Randall Pugh
Director

OPC Principal Officers

(All addressed at OPC Headquarters in Tucker, Georgia)

Thomas A. Smith
President and CEO

Michael W. Price
Executive Vice President and Chief Operating Officer

Elizabeth B. Higgins
Executive Vice President and Chief Financial Officer

W. Clayton Robbins
Senior Vice President, Government Affairs

William F. Ussery
Executive Vice President, Member and External Relations

Jami G. Reusch
Vice President, Human Resources

Municipal Electric Authority of Georgia

MEAG is a public corporation and an instrumentality of the State of Georgia, a body corporate and politic, created by the General Assembly of the State of Georgia in its 1975 Session (Official Code of Georgia Annotated, Title 46, Chapter 3, Article 3).

MEAG is neither owned, controlled nor dominated by an alien, foreign corporation or foreign government.

The names and addresses of MEAG's principal officers and the members of its governing body, all of whom are citizens of the United States, are as follows:

MEAG Directors

L. Keith Brady, Chairman
25 LaGrange Street
Newnan, GA 30263

Roland C. Stubbs, Jr., Vice-Chairman
115 Mims Road
Sylvania, GA 30467

Kerry S. Waldron, Secretary-Treasurer
106 S. Hutchinson Ave.
Adel, GA 31620

Patrick C. Bowie, Jr., Board Member
200 Ridley Avenue
LaGrange, GA 30241

Kelly E. Cornwell, Board Member
P. O. Box 248
Calhoun, GA 30703-0248

John H. Flythe, Board Member
P. O. Box 218
Fitzgerald, GA 31750

Robert. W. Lewis, Board Member
675 N. Marietta Pkwy
Marietta, GA 30060-1528

Steve A. Rentfrow, Board Member
P. O. Box 1218
Cordele, GA 31010-1218

Robert C. Sosebee, Board Member
1953 Homer Road
Commerce, GA 30529

MEAG Principal Officers

(All addressed at MEAG Headquarters in Atlanta, Georgia)

Robert P. Johnston
President and Chief Executive Officer

Charles B. Manning, Jr.
Senior Vice President, Participant and Corporate Affairs

MEAG Principal Officers (cont'd)

Mary G. Jackson
Senior Vice President and Chief Accounting Officer

James E. Fuller
Senior Vice President and Chief Financial Officer

Steven M. Jackson
Vice President, Power Supply

Gary M. Schaeff
Vice President, Transmission

J. Scott Jones
Vice President, Audit and Risk Management

City of Dalton

Dalton is neither owned, controlled, or dominated by an alien, foreign corporation, or foreign government.

The names and business addresses of Dalton's governing body (Mayor and Councilmen); the names and addresses of the Board of Water, Light and Sinking Fund Commissioners of the City of Dalton; and the names and addresses of Dalton Utilities' principal officers (President/Chief Executive Officer, Secretary, and Chief Financial Officer), all of whom are citizens of the United States, are as follows:

Mayor and Council of the City of Dalton

(All addressed at P.O. Box 1205, Dalton, Georgia 30722)

David Pennington, Mayor

Denise Wood, Councilman

George Sadosuk, Councilman

Dick Lowery, Councilman

Charles Bethel, Councilman

Board of Water, Light and Sinking Fund Commissioners of the City of Dalton

Norman Burkett, Chairman
c/o Dalton Utilities
P.O. Box 869
Dalton, GA 30722

Board of Water, Light and Sinking Fund Commissioners of the City of Dalton (cont'd)

Lamar Hennon, Vice Chairman
c/o Carpets of Dalton/Home Show Place
3010 Old Dug Gap Road
Dalton, GA 30720

George Mitchell, Commissioner
c/o Dalton Utilities
P.O. Box 869
Dalton, GA 30722

Smith Foster, Commissioner
c/o Plantex Machinery, Inc.
P. O. Box 1761
Dalton, GA 30722-1761

Dalton Utilities Officers

(All addressed at Dalton Utilities office identified in Section 3.2)

Don Cope
President and Chief Executive Officer

George Mitchell
Secretary

Tom Bundros
Chief Financial Officer

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