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# Chapter 13 Conduct of Operations

## 13.3 Emergency Planning

This section, in conjunction with Part 5 (*Emergency Plan*) of the Early Site Permit (ESP) Application, describes emergency planning for the proposed addition of two Westinghouse Electric Company, LLC (Westinghouse) AP1000 reactor units at the Vogtle Electric Generating Plant (VEGP) site. This section contains the information required by 10 CFR 52.17, *Contents of Applications*, involving review of the VEGP site physical characteristics for significant impediment to development of revised VEGP emergency plans. In addition, Southern Nuclear Operating Company, Inc. (SNC) has chosen to submit a proposed complete and integrated emergency plan (Part 5) for approval by the U.S. Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.17(b)(2)(ii).

The proposed emergency plan is designed to comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E. The emergency plan was developed using VEGP Emergency Plan, Revisions 43 and 42 **(SNC 2006)**, and the guidance contained in:

- NUREG 0654/FEMA-REP-1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,* Revision 1, U. S. Nuclear Regulatory Commission, November 1980 (NUREG-0654)
- NEI 99-01, *Methodology for Development of Emergency Action Levels* **(NEI 2003)**
- NEI 07-01, *Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reac*tors **(NEI 2007)**
- NUREG 0654/FEMA-REP-1, Revision1, Supplement 2, *Criteria for Emergency Planning in an Early Site Permit Application*, Draft Report Comment, U.S. Nuclear Regulatory Commission, April 1, 1996.

Because details of some elements of the emergency plan cannot be completed during the ESP application phase, Inspection Test Analysis and Acceptance Criteria (ITAAC) were developed and are included as appendices to the proposed VEGP Emergency Plan (i.e., ESP Application Part 5, Annex V2, Appendices 3 and 4).

The proposed emergency plan is intended to be used as the VEGP site emergency plan (all units licensed for the site) after a license is issued for Unit 3. It is expected that the site plan will be implemented before the first full participation exercise for Unit 3. It is expected that the first full participation exercise will occur approximately 1 year before the scheduled fuel load for Unit 3.

In the interim period before the first full participation exercise for Unit 3, the latest revision of the VEGP emergency plan will remain in effect for VEGP Units 1 and 2. SNC will submit a revision to the latest revision of the VEGP emergency plan in accordance with the provisions of 10 CFR 50.54(q) for VEGP Units 1 and 2 approximately 1 year before the scheduled full participation exercise for Unit 3. In the interim period between the approval of the ESP emergency plan

submitted in Part 5 of the ESP Application and the implementation of the approved ESP plan, the Plan will be revised as necessary in accordance with 10 CFR 50.54(q).

### 13.3.1 Physical Characteristics

#### 13.3.1.1 Site Description

SNC proposes to add two Westinghouse AP1000 pressurized water reactor units (new Units 3 and 4) to the existing VEGP site. The VEGP currently consists of two Westinghouse 1,200 megawatts electrical (MWe) pressurized water reactor units. The plant is on a 3,169-acre site located in the eastern portion of Burke County, Georgia, approximately 30 river miles upstream from the intersection of the Savannah River with U.S. Highway 301, as shown on Figure 13.3-1. With the exception of existing VEGP Units 1 and 2, and the Georgia Power Company (GPC) combustion turbine plant, Plant Wilson, there are no commercial, industrial, institutional, recreational, or residential structures within the proposed four unit site area. The nearest point to the exclusion area boundary (EAB) is the property line located approximately 3,500 ft southwest of the Unit 4 power block area. Figure 13.3-2 shows the site and the locations of the existing buildings on the site. The locations of the VEGP emergency facilities are also shown on Figure 13.3-2.

The site is located in a sparsely populated section of eastern Georgia near the Savannah River approximately 15 miles east-northeast of the City of Waynesboro. The area near the site is lowlands and is not used for commercial or industrial purposes other than agricultural and forestry related commercial enterprises. The site is adjacent to the Savannah River which is a major river in the southeastern United States, forming most of the border between South Carolina and Georgia. The river flows southeasterly and is approximately 350 miles long. The Savannah River is used primarily to support industry, recreation, and natural habitat development.

Adjacent to the site on the South Carolina side of the Savannah River is the United States Department of Energy's (DOE's) Savannah River Site (SRS). As described in an agreement **(DOE 1999)** between the DOE and SNC, DOE's SRS is responsible for all emergency planning for the area included in the VEGP emergency planning zones (EPZs) that lie within the boundaries of the SRS.

Land within about 10 miles of the site is primarily forested with limited agricultural and some rural housing. State highways that transverse the area within about ten miles of the site include Georgia Highways 23, 56, and 80 and South Carolina Highway 125. Several paved county roads also traverse the area within about 10 miles of the site. One railroad spur of the Norfolk Southern railroad line transverses the area within about 10 miles of the site and terminates at the VEGP site.

#### 13.3.1.2 Area Population

The small population center of Girard, Georgia (population 227 from 2000 census) is located approximately seven miles south of VEGP site. Also, the town of Sardis, Georgia (population 1,171 from 2000 census) is located approximately 12 miles south of the VEGP site.

The permanent population within about 10 miles of the VEGP site is estimated to be 3,017. Transient populations consist of daytime populations, recreation populations, and employment data. Most of the transient population will consist of areas used by hunters and fishermen along the Savannah River. These will be congregated near three public boat landings – Two in Burke County, Georgia(the Vogtle boat landing and Brigham's Landing); and one in Aiken County, South Carolina (Gray's Landing). The total peak transient population is estimated to be 750 **(IEM 2006)**. Two special facility populations are located within about 10 miles of the site. One is the VEGP site itself. Approximately 850 people work at the site. In addition, a private school (Lord's House of Praise Christian School) is located approximately 10 miles west of the Site. The school population consists of approximately 50 students and 20 teachers and staff.

Workforce populations for the SRS are described in the SRS emergency plan **(DOE 2005)**.

SNC concludes that there are no physical characteristics, unique to the VEGP site, which poses a significant impediment to development of the revised emergency plans for the VEGP.

### 13.3.2 Emergency Plan

Part 5 of the ESP Application contains the complete and integrated VEGP Emergency Plan.

### 13.3.3 Emergency Planning Zones

The emergency planning zones (EPZs) for the VEGP are based on the requirements contained in 10 CFR 50 Appendix E which require the plume exposure pathway to be an area about 10 miles in radius and the ingestion pathway EPZ to be an area about 50 miles in radius. The VEGP EPZs meet this requirement and are defined as the area about 10 miles and 50 miles in radius respectively, from a point midway between VEGP Units 1 and 2. The defined EPZs for the proposed AP1000 units will use the same EPZs as are currently defined for VEGP Units 1 and 2. The plume exposure EPZ is shown on Figure 13.3-3 and the ingestion pathway EPZ is shown on Figure 13.3-4.

#### 13.3.3.1 Plume Exposure Pathway

Using the guidance contained in NUREG-0654, SNC has further defined the plume exposure into a set of geopolitical zones as described in Table 13.3-2, and shown in Figure 13.3-3.

#### 13.3.3.2 Ingestion Pathway

The EPZ for ingestion exposure includes an area within a 50 mile radius of the VEGP. Table 13.3-1 below shows the respective counties in each State that are located within the ingestion pathway.

**Table 13.3-1 VEGP Ingestion Pathway Counties**

| Georgia Counties | | South Carolina Counties | |
|---|---|---|---|
| Bulloch | Burke | Aiken | Allendale |
| Candler | Columbia | Bamburg | Barnwell |
| Effingham | Emanuel | Colleton | Edgefield |
| Glasscock | Jefferson | Hampton | Lexington |
| Jenkins | Johnson | McCormick | Orangeburg |
| Lincoln | McDuffie | Saluda | Jasper |
| Richmond | Screven | | |
| Warren | Washington | | |

Planning for the ingestion exposure pathway is a responsibility of the States of Georgia and South Carolina. Detailed information about the ingestion exposure pathway EPZ can be obtained from the States' Radiological Emergency Plans **(Georgia 2005a, 2005b; South Carolina 2004)**. The ingestion exposure pathway EPZ is shown in Figure 13.3-4.

### 13.3.4 Evacuation Time Estimates

To support the Vogtle ESP application for the proposed new AP1000 units at the VEGP, SNC contracted with Innovative Emergency Management, Inc. (IEM) to produce new evacuation time estimates (ETE) for the VEGP plume exposure pathway. IEM conducted the analysis using estimated 2006 population data and projected 2010 population data. The methods used to obtain population data and to estimate the ETEs are documented in an IEM report **(IEM 2006)**.

The total permanent resident populations within the 10-mile EPZ for the VEGP are estimated to be 3,017 for 2006 and 3,162 for 2010. This population is broken down by protective action zone (PAZ) and by sector and ring within the report. There is not a major change in the permanent population figures because the power station is located in a densely wooded rural area, and no significant changes in the land use pattern is expected around the plant in the next four years. Transient population consists of workers employed within the area and recreational sportsmen on the Savannah River. Special facilities populations are composed of students, teachers, and other employees at the Lord's House of Praise Christian School, and employees of the VEGP.

Based on experiences following the construction of Units 1 and 2, the permanent population within the 10 mile EPZ is not expected to increase significantly during the construction and subsequent operation of Units 3 and 4.

IEM used PTV Vision VISUM, a computer simulation model, to perform the ETEs. In order to represent the most realistic emergencies, ETEs have been prepared for several temporal, seasonal, and weather conditions. Evacuations for the nine geographical evacuation areas were modeled individually in each of three seasonal scenarios: Winter Weekday, Winter Weeknight, and Fall Weekend. The winter weekday and weeknight scenarios represent summer weekday and weeknight scenarios because the populations are the same. The fall weekend scenarios are the same as the other weekends except for the areas on and around the Savannah River, which includes an increased population due to recreational sportsmen. These scenarios were considered under both fair and adverse weather conditions. ETEs for 2006 fair weather ranged from 1 hour and 25 minutes to 1 hour and 45 minutes. ETEs for 2006 adverse weather conditions ranged from 1 hour 40 minutes to 1 hour 55 minutes. ETEs for 2010 fair weather conditions ranged from 1 hour 45 minutes to 1 hour 55 minutes. ETEs for 2010 adverse weather conditions ranged from 2 hours 5 minutes to 2 hours 45 minutes. No significant traffic congestion was observed for simulations for either 2006 or 2010.

### 13.3.5 Contacts and Agreements

SNC currently maintains letters of agreement or contracts with State and local government agencies, the DOE SRS, medical support facilities, local radio and television companies, and independent industry support organizations (all referred to as simply ‘agencies’), in support of emergency planning at the VEGP for existing Units 1 and 2. Table 13.3-3 identifies the agencies in which SNC maintains current letters of agreements or contracts with, including the point of contact for each agency, with the exception of local radio and television companies. Agreements with local radio and television companies will be transferred to the respective State and/or local emergency plans. Copies of the existing letters of agreement and contracts were submitted under separate correspondence (SNC 2006a).

In support of this ESP Application, SNC contacted each of the agencies listed in Table 13.3-3 by letter (i.e., supplemental letters of agreement) notifying them of the proposed addition of two new AP1000 reactor plants at the VEGP site and the revised emergency plans for VEGP. Each agency received one of two types of supplemental letters of agreement, depending on the type of agency. One type of supplemental letter of agreement requested the agency to commit to continued participation in any further development of the VEGP emergency plans. The second type of supplemental letter of agreement requested the agency to concur that the proposed VEGP emergency plans are practicable and to commit to participating in any further development of the VEGP emergency plans, including required field demonstrations under the plans. Each agency committed to their requested responsibilities specified in the supplemental letters of agreement by signing the letter. Therefore, the executed supplemental letters of agreement, along with the existing letters of agreement, certify that (1) the proposed VEGP Emergency Plan is practicable; (2) the agencies are committed to participating in any further development of the proposed VEGP Emergency Plan, including any required field demonstrations; and (3) the

agencies are committed to executing their responsibilities under the VEGP Emergency Plan in the event of an emergency. Item (3) is addressed in the existing letters of agreement and contracts with State and local government agencies, the DOE SRS, medical support facilities, and independent industry support organizations. Copies of the supplemental letters of agreement are provided in Appendix 13.3A.

## Table 13.3-2 Geographical Boundaries of Evacuation Zones

| Evacuation Zones | Geographical Boundaries |
|---|---|
| **A** | Northeast - Savannah River |
| | Southeast, South/Southwest and West Northwest - 2-mile area |
| **B-5** | North - 2-mile area |
| | West-Ebenezer Road |
| | Southwest - GA Highway 23 |
| | South - Chance Road |
| | Southeast - Griffin's Landing Road |
| | Northeast - Savannah River |
| **B-10** | Northwest - Griffin's Landing Road |
| | West-Dixon Road and City of Girard eastern boundary |
| | Southwest – Stony Bluff Road |
| | Southwest – Royal Road and the 10-mile area |
| | Northeast – Savannah River |
| **C-5** | Northwest – Jack Delaigle Road |
| | Southwest – GA Highway 23 |
| | East – Ebenezer Church Road |
| **C-10** | North – Chance Road |
| | West – Briar Creek Road, Buck Road, and GA Highway 23 |
| | South – Johnson Road, Ellison Road, Murray Hill Road, and the 10-mile area |
| | Southeast – Stony Bluff Road |
| | East – City of Girard eastern boundary and Dixon Road |
| **D-5** | North – Hancock Landing Road |
| | West – Hancock Landing Road and Thomas Road |
| | Southwest – Hatchers Mill Road and Thompson Bridge Road |
| | South – Gordon Road and Tom Bargeron Road |
| | East – GA Highway 23, Brier Creek Road, and Buck Road |
| **E-5** | North – Ben Hatcher Road |
| | East – River Road |
| | South – Hancock Landing Road |
| | West – Nathaniel Howard road |
| **E-10** | Northeast – Nathaniel Howard Road |
| | North – GA Highway 80, GA Highway 23, and Ben Hatcher Road |
| | West – 10-mile area and Bates Road |
| | South – Thompson Bridge, Seven Oaks Road, and Botsford Church Road |
| | East – Hancock Landing Road |
| **F-5** | North – Savannah River |
| | East – Savannah River |
| | West – 5-mile radius and River Road |
| | South – 2-mile area |
| **F-10** | Northeast – Savannah River |
| | West – 10-mile radius and GA Highway 23 |
| | South – Ben Hatcher Road |
| | East – River Road and the 5-mile area |

## Table 13.3-2 (Continued)Geographical Boundaries of Evacuation Zones

| Evacuation Zones | Geographical Boundaries |
|---|---|
| **G-10** | North – Gray's Landing on the Savannah River to the CSX railroad track and Cowden Plantation road |
| | East – SRS boundary and the CSX boundary |
| | South – Savannah River and the SRS boundary |
| | West – Savannah River |
| **H-10** | North – SRS boundary and South Carolina Highway 125 extending into Allendale County's northern boundary |
| | East – Creek Plantation Road |
| | South – Savannah River |
| | West – SRS boundary |

## Table 13.3-3 Agency Agreements and Points of Contact

| Agency | Contact/Title | Address |
|---|---|---|
| Aiken County Emergency Services | David Ruth/<br><br>EP Coordinator | 828 Richland Ave. West<br><br>Aiken, SC 29801 |
| Allendale County EPA | Linda Sanders/<br><br>Director | P.O. Box 129<br><br>Allendale, SC 29810 |
| AREVA ANP, Inc. | Mr. Ed Petterson<br><br>Manager, SG Business Development | 155 Mill Ridge Road<br><br>Lynchburg, VA 24502 |
| Barnwell County EMA | Roger Riley/<br><br>Director | 57 Wall St.<br><br>Barnwell, SC 29812 |
| Bechtel Power Corporation | J. E. Love/ NOPS Project Manager | 5275 Westview Drive<br><br>Frederick, Maryland |
| Burke County EMA | Rusty Sanders/ Director | P.O. Box 51-B<br><br>Waynesboro, GA 30830 |
| Burke County Sheriff's Department | Mr. Gregory T. Coursey/Sheriff | 25 Highway 24 South<br><br>P.O. Box 702<br><br>Waynesboro, GA 30830 |
| Burke Medical Center | Jennifer A. Royal/ Administrator | 351 Liberty Street<br><br>Waynesboro, Georgia 30830 |
| Doctors Hospital | Mr. C. Shayne George President/CEO | 3651 Wheeler Road<br><br>Augusta, GA 30909 |
| Dr. B. Lamar Murray | Dr. B. Lamar Murray | 311 4th Street<br><br>Waynesboro, Georgia 30830 |
| Georgia DNR | James Hardeman/<br><br>Manager, Radiological Programs | 4244 International Parkway, Suite 114<br><br>Atlanta, Georgia 30354 |
| Georgia OHS | Charles English/<br><br>Acting Director | P.O. Box 18055<br><br>Atlanta, GA 30316-0055 |
| Joseph M. Still Burn Centers Inc. | Dr. Robert F. Mullins | P.O. Box 3725<br><br>Augusta, Georgia 30914-3725 |
| Medical Specialists, Inc. | Dr. Joseph L. Jackson Sr. | 305 Jones Ave.<br><br>Waynesboro, GA 30830 |

## Table 13.3-3 Agency Agreements and Points of Contact

| Agency | Contact/Title | Address |
|---|---|---|
| National Oceanic and Atmospheric Administration (NWS) | Dean P. Gulezian/ Director, NWS Eastern Region | 630 Johnson Ave.<br><br>Bohemia, NY 11716 |
| Radiation Management Consultants, Inc. | Dr. Roger Linnemann/ President | 3019 Darnell Road<br><br>Philadelphia, PA |
| South Carolina DHEC | Sandra Threatt/<br><br>Manager, Nuclear Response & Environmental Surveillance | 2600 Bull Street<br><br>Columbia, SC 29201 |
| South Carolina EMD | Ron Osborne/<br><br>Director | 1100 Fish Hatchery Road<br><br>West Columbia, SC 29172 |
| US DOE | Cindy Brizes | P.O. Box A<br><br>Aiken, South Carolina |
| Westinghouse Electric Co. Nuclear Services | E. C. Arnold/<br><br>Manager, Southern Nuclear Projects | P. O. Box 355<br><br>Pittsburgh PA 15230-0355 |
| WSRC Emergency Management | Debra Foutch | Building 703-43A,<br><br>Room 34-6<br><br>Aiken, SC 29808 |

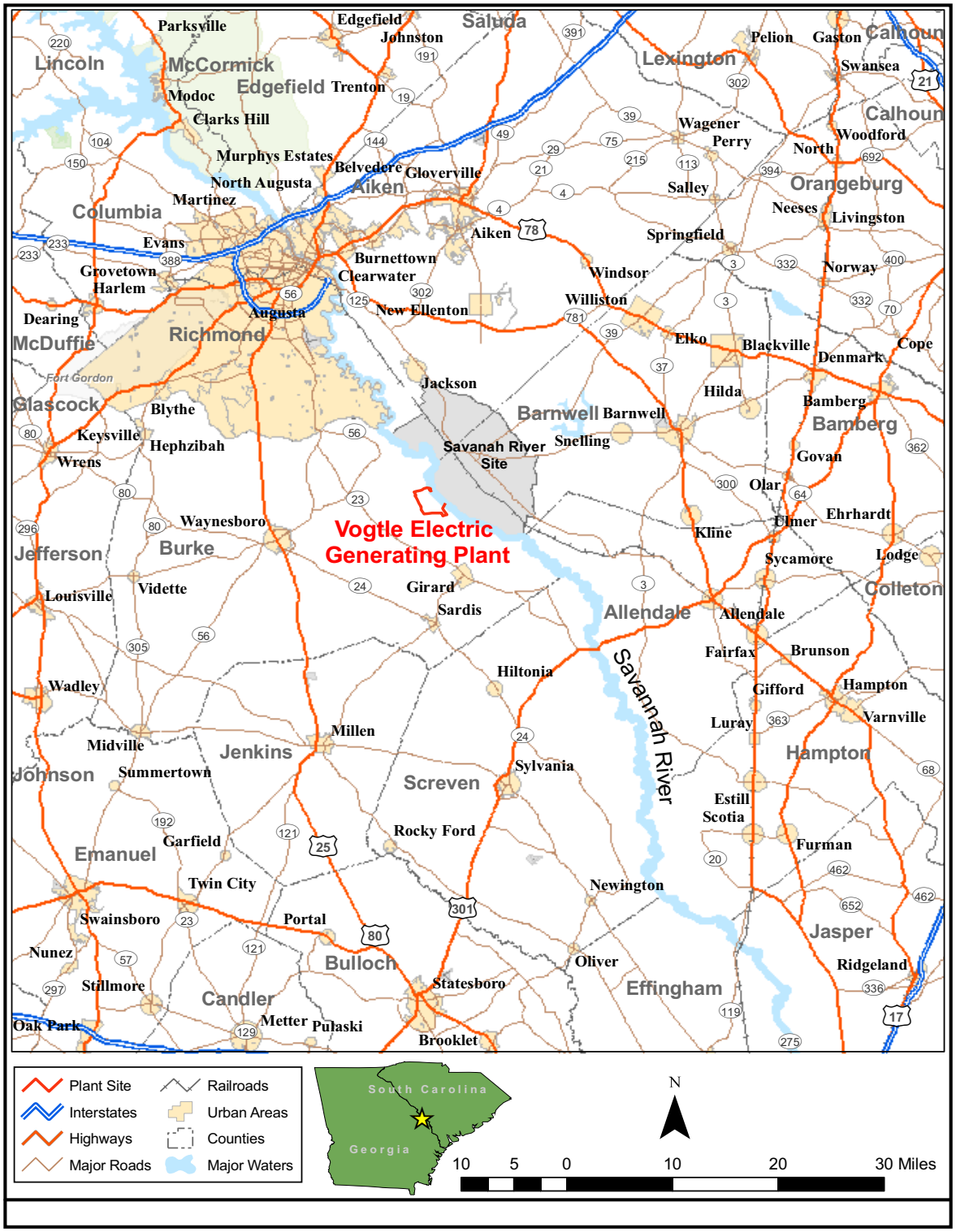


**Figure 13.3-1 VEGP Site Vicinity Map**

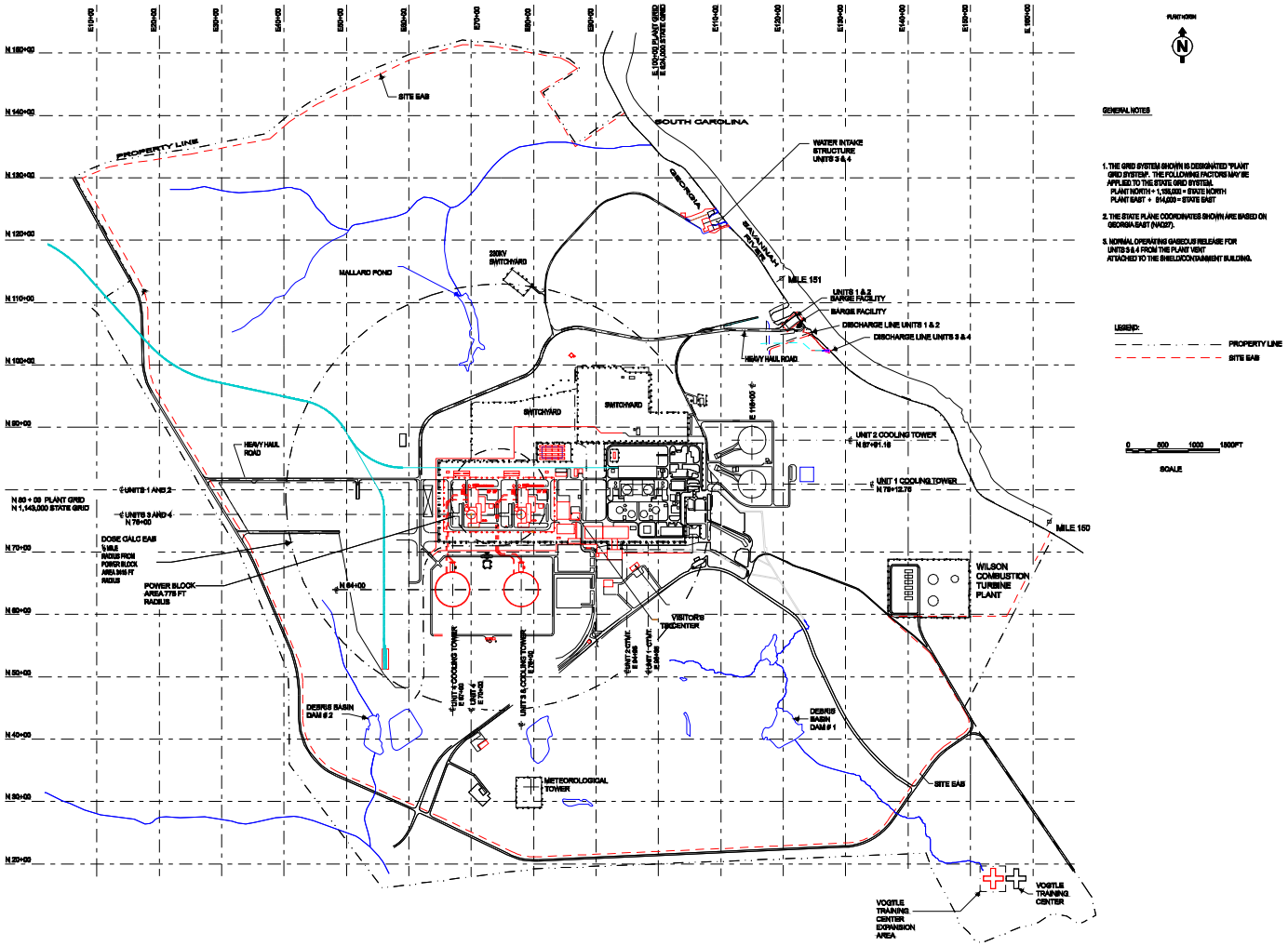


**Figure 13.3-2 VEGP Site Map**

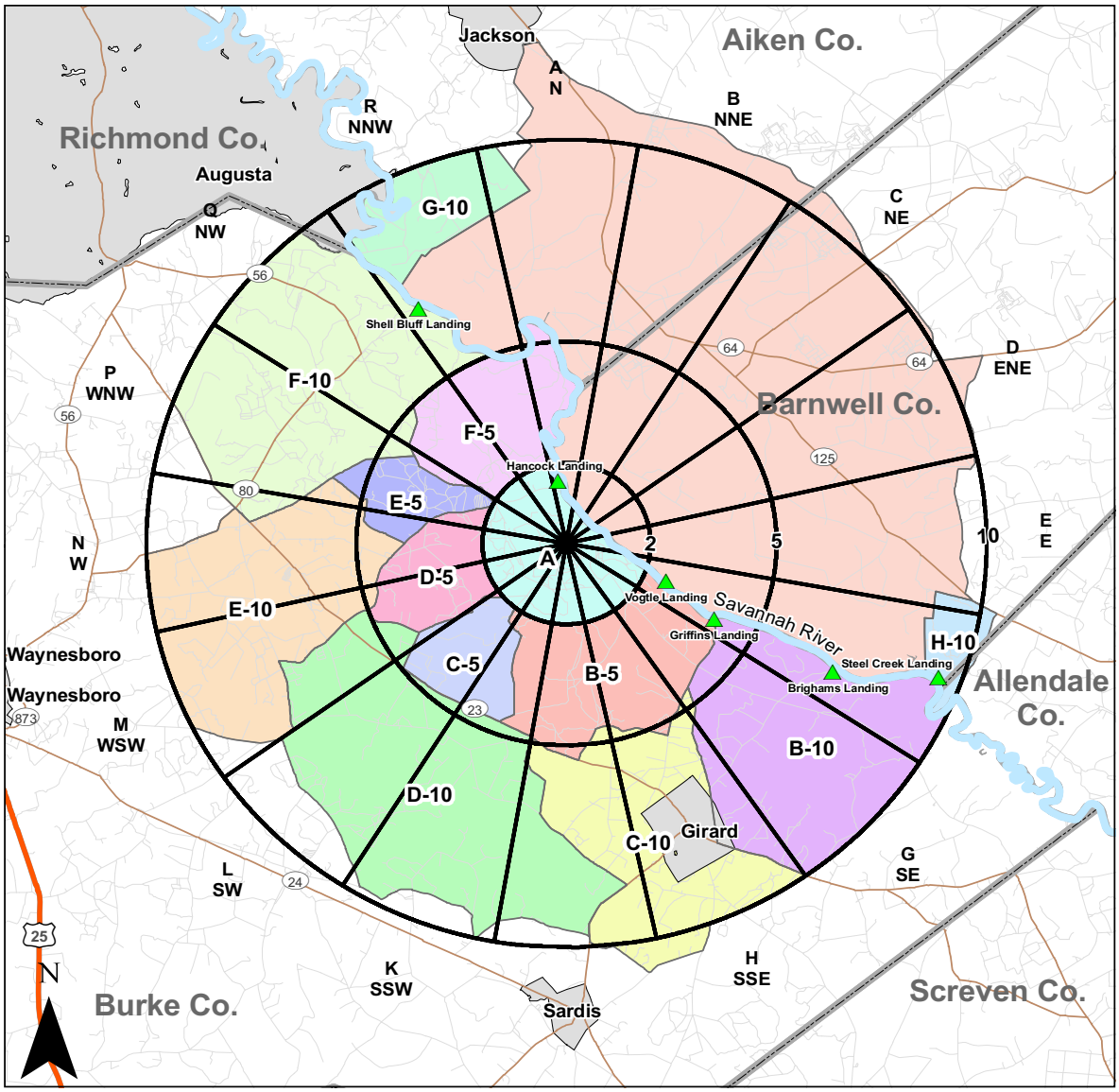


**Figure 13.3-3 VEGP Plume Exposure Geopolitical Zones**

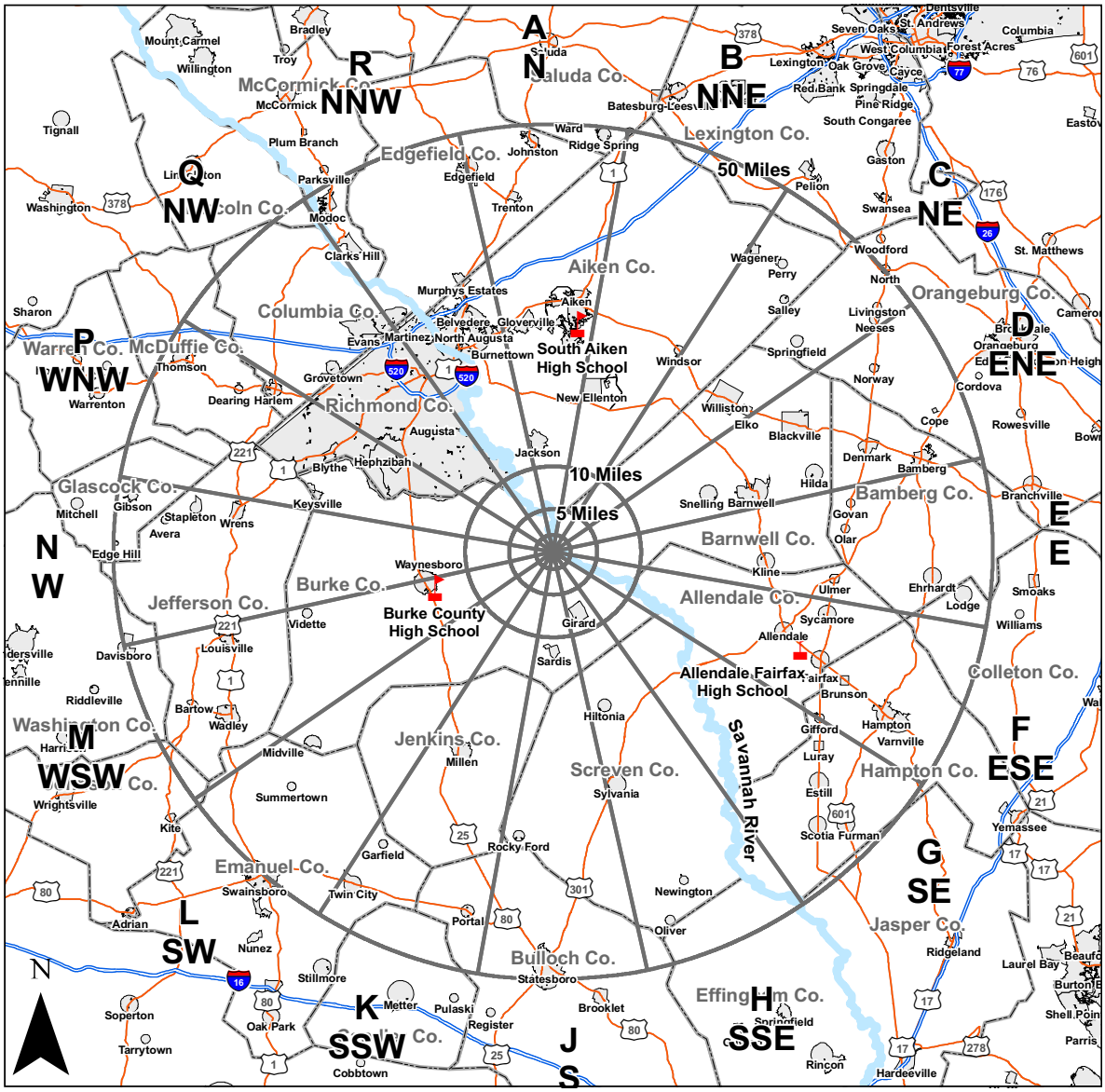


**Figure 13.3-4 VEGP Ingestion Pathway**

## Section 13.3 References

**(DOE 1999)** Savannah River Operations Office Memorandum of Agreement with the Vogtle Electric Generating Plant, April 1999.

**(DOE 2005)** Savannah River Site Emergency Plan (U), September 2005.

**(Georgia 2005a)** State of Georgia Radiological Emergency Plan – Base Plan, Office of Homeland Security, April 2005.

**(Georgia 2005b)** State of Georgia Radiological Emergency Plan – Annex D, Plant Vogtle, Office of Homeland Security, May 2005.

**(IEM 2006)** Report, *Evacuation Time Estimates for the Vogtle Electric Generating Plant,* Innovative Emergency Management, Inc., May 2006.

**(NEI 2003)** Technical Report NEI 99-01, *Methodology for Development of Emergency Action Levels*, Revision 4, Nuclear Energy Institute, January 2003.

**(NEI 2007)** NEI 07-01, *Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors,* February 2007.

**(SNC 2006)** Vogtle Electric Generating Plant Emergency Plan, Revision 42, Southern Nuclear Operating Company, January 2006.

**(SNC 2006)** Vogtle Electric Generating Plant Emergency Plan, Revision 43, Southern Nuclear Operating Company, May 2006.

**(SNC 2006a)** *Letter AR-06-1721*, Southern Nuclear Operating Company to U.S. Nuclear Regulatory Commission, dated August 17, 2006.

**(South Carolina 2004)** State of South Carolina Radiological Emergency Response Plan, Office of Adjutant General, June 2004.

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# Appendix

## 13.3A Supplemental Letters of Agreement

Copies of the supplemental letters of agreement follow in order from the below listed agencies:

Aiken County Emergency Services
Allendale County EPA
AREVA ANP
Barnwell county EMA
Bechtel Power Corporation
Burke County EMA
Burke County Sheriff's Department
Burke Medical Center
Doctors Hospital
Dr. B. Lamar Murray
Georgia DNR
Georgia OHS
Joseph M. Still Burn Centers Inc.
Medical Specialists, Inc.
National Oceanic and Atmospheric Administration (NWS)
Radiation Management Consultants, Inc.
South Carolina DHEC
South Carolina EMD
US DOE
Westinghouse Electric Co. Nuclear Services
WSRC Emergency Management

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**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

**SOUTHERN COMPANY**
*Energy to Serve Your World℠*

April 17, 2006

AR-06-0775

Mr. David Ruth
EP Coordinator, Aiken County Emergency Services
828 Richland Avenue West
Aiken, SC 29801

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Ruth:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the ESP Application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR Part 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Aiken County Emergency Services are aware of the SNC ESP proposed revision to the existing VEGP EP to include provisions for the addition of two new reactors at the VEGP site. Aiken County Emergency Services concur that the proposed EP is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

David Ruth, EP Coordinator
Aiken County Emergency Services

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

SOUTHERN COMPANY
*Energy to Serve Your World*℠

AR-06-0776

April 17, 2006

Ms. Linda Sanders
Director, Allendale County EPA
P. O. Box 129
Allendale, SC 29810

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Ms. Sanders:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP)

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP Property. Included in the ESP Application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR Part 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Allendale County EPA is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Allendale County EPA concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

Linda Sanders, Director
Allendale County EPA

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
P. O. Box 1295
Birmingham, Alabama 35201-1295
Tel 205.992.5000

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JUL 17 2006

AR-06-1555

Mr. Ed Petterson
Manager, SG Business Development
AREVA NP Inc.
155 Mill Ridge Road
Lynchburg, VA 24502

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Mayer:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan. Southern Nuclear understands that commitment to support is bounded by existing Purchase Order SN040082 with Framatome (now Areva) and that Areva would support expanding the scope of this PO to cover the additional VEGP units described.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by July 21, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

AREVA NP Inc. (formerly Framatome ANP, Inc.) is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. AREVA NP, Inc. commits to continuing support in further development of emergency plans. Commitment to support is bounded by existing Purchase Order SN040082 with Framatome (now Areva). Areva supports expanding the scope of this PO to cover the additional VEGP units

Peterson for JD Gale 8/8/06
~~Charlie Mayer, Product Manager~~ JD Gale, VP Sr. Services
Framatome ANP, Inc.

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.O1.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

SOUTHERN COMPANY
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April 17, 2006

AR-06-0777

Mr. Roger Riley
Director, Barnwell County EMA
57 Wall Street
Barnwell, SC 29812

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Riley:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Barnwell County EMA is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Barnwell County EMA concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

Roger Riley

Roger Riley, Director
Barnwell County EMA

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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April 17, 2006

AR-06-0778

Mr. J. E. Love
NOPS Project Manager
Bechtel Power Corporation
5275 Westview Drive
Frederick, MD 21703-8306

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Love:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Bechtel Power Corporation is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Bechtel Power Corporation commits to continuing participation in any further development of emergency plans.

J. E. Love, NOPS Project Manager
Bechtel Power Corporation

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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April 17, 2006

AR-06-0779

Mr. Rusty Sanders
Director, Burke County EMA
P. O. Box 51-B
Waynesboro, GA 30830

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Sanders:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP Application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP EP to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Burke County EMA is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Burke County EMA concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

Rusty Sanders

Rusty Sanders, Director
Burke County EMA

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

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**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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JUN 12 2006

AR-06-1263

Mr. Gregory T. Coursey
Sheriff
Burke County, Georgia
25 Highway 24 South
P.O. Box 702
Waynesboro, GA 30830

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Sheriff Coursey:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by July 11, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

The Burke County Sheriff's ~~Department~~ Office is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. The Burke County Sheriff's Department commits to continuing participation in any further development of emergency plans.

Gregory T. Coursey, Sheriff
Burke County, Georgia

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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April 17, 2006

AR-06-0780

Ms. Jennifer A Royal
Administrator, Burke Medical Center
351 Liberty Street
Waynesboro, GA 30830

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Ms. Royal:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of

emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Burke Medical Center is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Burke Medical Center commits to continuing participation in any further development of emergency plans.

Jennifer Royal, Administrator
Burke Medical Center

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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AR-06-1264

Mr. Terry J. Guinn
President, CEO
Doctors Hospital
3651 Wheeler Road
Augusta, GA 30909

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Guinn:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

RECEIVED JUN 1 3 2006

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by July 11, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Doctors Hospital is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Doctors Hospital commits to continuing participation in any further development of emergency plans.

7/19/06

~~Terry J. Guinn, President/CEO~~ Shayne George, CEO
Doctors Hospital

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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April 17, 2006

AR-06-0782

Dr. B. Lamar Murray
311 4th Street
Waynesboro, GA 30830

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Dr. Murray:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of

emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Dr. B. Lamar Murray is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Dr. Murray commits to continuing participation in any further development of emergency plans.

Dr. B. Lamar Murray

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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April 17, 2006

AR-06-0785

Mr. James Hardeman
Manager, Radiological Programs
Georgia Department of Natural Resources
4244 International Parkway, Suite 114
Atlanta, GA 30354

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Hardeman:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR Part 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to

those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Georgia Department of Natural Resources is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Georgia Department of Natural Resources concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

J. Hardeman

James Hardeman, Manager ~~Radiological Programs~~ Environmental Radiation Program
Georgia Department of Natural Resources Environmental Protection Division

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Georgia Department of Natural Resources**
4220 International Parkway, Suite 100, Atlanta, Georgia 30354
Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director
Environmental Protection Division

April 27, 2006

Mr. Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

Dear Mr. Pierce :

This letter is in response to your letter to me of April 17, 2006, in which you requested concurrence on Southern Nuclear's efforts to revise the Vogtle Electric Generating Plant (VEGP) Emergency Plan to reflect the addition of two (2) new Westinghouse AP1000 reactors on the Vogtle site. In particular, you requested that I return a signed copy of the letter to you, with my signature indicating that this agency a) is aware of the proposed revision to the VEGP Emergency Plan to incorporate provisions for two (2) new AP1000 reactors at the Vogtle site, b) concurs that the revised VEGP Emergency Plan is practicable, and c) commits to continuing participation in the development of the VEGP emergency plan, including participation in field demonstrations.

We have been working for some time with Southern Nuclear emergency preparedness staff in this effort, primarily with Mr. Walt Lee, and (prior to his illness) Mr. Chris Boone. We are indeed familiar with Southern Nuclear's plans to submit an Early Site Permit (ESP) application to NRC in the near future, and we have been and remain supportive of Southern Nuclear's efforts to revise the VEGP Emergency Plan to reflect the additional two (2) planned units.

I am pleased to return the signed "Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP" in accordance with your request.

If I can be of additional assistance, please contact me by letter, by telephone at (404) 362-2675 or by electronic mail at Jim_Hardeman@dnr.state.ga.us

Sincerely,

J. Hardeman

James C. Hardeman, Jr., Manager
Environmental Radiation Program

cc: Walt Lee (electronic)

Attachment as stated

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

RECEIVED

APR 25 2006

GEMA

SOUTHERN COMPANY
*Energy to Serve Your World*℠

April 17, 2006

AR-06-0788

Mr. Charles English
Acting Director, OHS GEMA
P. O. Box 18055
Atlanta, GA 30316-0055

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. English:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR Part 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

OHS GEMA is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. OHS GEMA concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of emergency plans, including any required field demonstrations.

Charles English, Acting Director
OHS GEMA

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

**SOUTHERN COMPANY**
*Energy to Serve Your World*℠

May 02, 2006 AR-06-0781

Dr. Robert F. Mullins
Joseph M. Still Burn Centers Inc.
P. O. Box 3725
Augusta, GA 30914-3725

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Dr. Mullins:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of

emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Joseph M. Still Burn Centers Inc. is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Joseph M. Still Burn Centers Inc. commits to continuing participation in any further development of emergency plans.

Dr. Robert F. Mullins
Joseph M. Still Burn Centers Inc.

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

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April 17, 2006

AR-06-0786

Dr. Joseph L. Jackson Sr.
Medical Specialists, Inc.
305 Jones Avenue
Waynesboro, GA 30830

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Dr. Jackson:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of

emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Medical Specialists, Inc. is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Medical Specialists, Inc. commits to continuing participation in any further development of emergency plans.

Dr. Joseph L. Jackson Sr.
Medical Specialists, Inc.

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

AUGUSTA, GA

SOUTHERN COMPANY
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April 17, 2006

AR-06-0787

Mr. Dean P. Gulezian
Director, NWS Eastern Region
U. S. Department of Commerce
National Oceanic and Atmospheric Administration
630 Johnson Avenue
Bohemia, NY 11716

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Gulezian:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

National Oceanic and Atmospheric Administration NATIONAL WEATHER SERVICE is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. National Oceanic and Atmospheric Administration NATIONAL WEATHER SERVICE commits to continuing participation in any further development of emergency plans.

Dean P. Gulezian

Mr. Dean P. Gulezian
Director, NWS Eastern Region
National Oceanic and Atmospheric Administration

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**U.S. DEPARTMENT OF COMMERCE**
**National Oceanic and Atmospheric Administration**
National Weather Service – Eastern Region
Airport Corporate Center
630 Johnson Avenue
Bohemia, New York 11716

May 5, 2006

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

Dear Mr. Pierce:

Please find enclosed the concurrence you requested I sign regarding the National Oceanic and Atmospheric Administration/National Weather Service commitment to work with your company in further development of emergency plans for the Vogtle Plant. Please work directly with our Columbia, SC Weather Forecast Office on future emergency planning for the plant. Kimberly Campbell, Meteorologist-in-Charge, will be your point of contact. Ms. Campbell can be reached at 803-765-5501 or Kimberly.campbell@noaa.gov .

We look forward to assisting you with this project.

Sincerely,

Dean P. Gulezian
Director, Eastern Region
National Weather Service

Enclosure

cc: Kimberly Campbell

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

**SOUTHERN COMPANY**
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April 17, 2006

AR-06-0789

Dr. Roger E. Linnemann
President
Radiation Management Consultants, Inc.
3019 Darnell Road
Philadelphia, PA 19154-3201

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Dr. Linnemann:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Radiation Management Consultants, Inc. is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Radiation Management Consultants, Inc. commits to continuing participation in any further development of emergency plans.

Roger Linnemann

Dr. Roger H. Linnemann, President
Radiation Management Consultants, Inc.

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

**SOUTHERN COMPANY**
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April 17, 2006

AR-06-0790

Ms. Sandra Threatt
South Carolina DHEC
2600 Bull Street
Columbia, SC 29201

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Ms. Threatt:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

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APR 26 2006
SC DHEC BUREAU OF
LAND & WASTE MANAGEMENT

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

South Carolina DHEC is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. South Carolina DHEC concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

~~Sandra Threatt~~ Chris Staton, Director
South Carolina DHEC Division of Waste Assessment & Emergency Response

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

April 17, 2006

AR-06-0791

Mr. Ron Osborne
Director, South Carolina EMD
1100 Fish Hatchery Road
West Columbia, SC 29172

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Osborne:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

South Carolina EMD is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. South Carolina EMD concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

R Osborne

Ron Osborne, Director
South Carolina EMD

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

**SOUTHERN COMPANY**
*Energy to Serve Your World*℠

April 17, 2006

AR-06-0792

Ms. Cindy Brizes
U. S. Department of Energy
P. O. Box A
Aiken, SC 29802

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Ms. Brizes:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce

Charles R Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

U. S. Department of Energy (DOE) is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. DOE concurs that the proposed emergency plan is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

Cindy Brizes
U. S. Department of Energy

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

**Southern Nuclear**
**Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201

**SOUTHERN COMPANY**
*Energy to Serve Your World*℠

April 17, 2006

AR-06-0793

Mr. E. C. Arnold
Manager, Southern Nuclear Projects
Westinghouse Electric Company
Nuclear Services
P. O. Box 355
Pittsburgh, PA 15230-0355

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Mr. Arnold:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit Application's proposed four-unit Emergency Plan.

SNC intends to submit an Early Site Permit application, pursuant to 10 CFR 52, "Early Site Permits; Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The Early Site Permit Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. 10 CFR Part 52 requires, in part, that the Emergency Plan submitted with the Early Site Permit application include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revision to the Emergency Plan for VEGP. In completing the Emergency Plan revision, SNC has concluded that this process provides no additional requirements to the established emergency plans and commitments.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new nuclear reactors at the VEGP site and your continuing commitment to participation in any further development of emergency plans.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the Early Site Permit Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R. Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

Westinghouse Electric Company is aware of the SNC Early Site Permit proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. Westinghouse Electric Company commits to continuing participation in any further development of emergency plans.

E. C. Arnold, Manager, Southern Nuclear Projects
Westinghouse Electric Company

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

Westinghouse

Westinghouse Electric Company
Nuclear Services
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355
USA

GP-17923
May 4, 2006

Mr. D. E. Grissette
Vice President, Nuclear Vogtle Project
Southern Nuclear Operating Company, Inc.
P. O. Box 1295
Birmingham, Alabama 35201

Ref: AR-06-0793

ATTN: Charles Pierce

SOUTHERN NUCLEAR OPERATING COMPANY
VOGTLE ELECTRIC GENERATING PLANT UNITS 1 AND 2
Transmittal of Signed Copy of Proposed Four-Unit Emergency Plan

Dear Mr. Grissette:

Enclosed is a signed copy of the reference letter, indicating Westinghouse concurrence to support the Vogtle proposed four unit Emergency Plan as requested by the reference. The original of this enclosure has been mailed to Walter Lee at Southern Nuclear.

Should you have any questions or comments on this please contact me at 412-374-3365.

Very truly yours,

E. C. Arnold, Manager
Southern Nuclear Projects

/jag

Encl.

Original electronically approved in EDMS 2000

Mr. Grissette

GP-17923
May 4, 2006

cc: R. H. Parker (SNC Document Mgmt.)
J. G. Aufdenkampe
R. S. Cowman
T. E. Tynan
S. C. Swanson
C. R. Pierce
W. H. Lee *
J. L. Tain
P. D. Rushton

* w/att.

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**SOUTHERN COMPANY**
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AR-06-0794

April 17, 2006

Ms. Debra Foutch
WSRC Emergency Management
Building 703-43A, Room 34-6
Aiken, SC 29808

Re: Vogtle Electric Generating Plant Early Site Permit
Request for Commitment to Support a Future Four-Unit Emergency Plan for VEGP

Dear Ms. Foutch:

Southern Nuclear Operating Company (SNC) is requesting your commitment in support of the Vogtle Electric Generating Plant (VEGP) Early Site Permit (ESP) Application's proposed four-unit Emergency Plan (EP).

SNC intends to submit an ESP application, pursuant to 10 CFR 52, "Early Site Permits, Standard Design Certification, and Combined Licenses for Nuclear Power Plants," in August 2006. The ESP Application evaluates the addition of two Westinghouse AP1000 advanced reactor plants on the VEGP property. Included in the application will be a Complete and Integrated Emergency Plan, as defined in 10 CFR 52 and under guidance contained in NUREG-0654 FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." 10 CFR 52 requires, in part, that the submitted EP include a description of contacts and arrangements made with local and State agencies with emergency planning responsibilities. Contacts are being accomplished with this written correspondence; arrangements are the plans and commitments already in place to protect public health and safety in case of a nuclear accident.

SNC has prepared a revised EP for VEGP. The revised plan will consist of a base plan (applicable to all four nuclear units) and two annexes, one for each of the two plant designs (existing and AP1000). The base plan and each annex contain appendices that are applicable to the respective annex.

SNC is also in the process of conducting a new evacuation time estimate (ETE) study for the VEGP site. Preliminary results suggest that no major changes in evacuation plans and procedures will be required to support the addition of two new nuclear units at the VEGP site.

The revised EP is similar to the existing plan, but has been modified to incorporate the addition of two advanced Westinghouse AP1000 units. In support of the addition of new nuclear units at the VEGP site, SNC intends to add a separate facility that will contain the technical support center (TSC) for the site. Communication equipment and operational procedures will be very similar to those currently used at VEGP. Using a single TSC should help minimize the impact of the revised plan on State and county emergency planning. Changes to the plan include:

- Revision of staffing tables for the new nuclear units
- Addition of site specific Emergency Action Levels (EALs) for the new nuclear units
- Addition of two operational support centers, one each for the new nuclear units
- Addition of a new TSC to be used for all four units
- Revisions to reflect the new ETE study

In completing the ESP Application's EP, SNC has concluded that this process provides no additional requirements to the established EPs for evacuation or the implementation of other protective actions.

Enclosed are two original copies of this letter. Please sign both, retain one for your files and return one to me. Your signature will attest to your awareness of SNC's intent to revise the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site, your concurrence that the proposed EP is practicable, and your continuing commitment to participation in any further development of emergency plans, including any required field demonstrations.

SNC will continue to support your emergency planning efforts. Please direct comments and questions to Walter H. Lee, SNC's Emergency Planning Supervisor, at (205) 992-5627.

To support our schedule for the ESP Application, SNC would appreciate receiving your written concurrence by May 15, 2006. We thank you again for your continued support of emergency planning at the VEGP site, and we look forward to working with you and your staff in the future.

Respectfully,

Charles R Pierce

Charles R Pierce
Early Site Permit Manager
Southern Nuclear Operating Company
40 Inverness Center Parkway
Birmingham, AL 35242

**Agency Concurrence:**

WSRC Emergency Management is aware of the SNC ESP proposed revision to the existing VEGP Emergency Plan to include provisions for the addition of two new reactors at the VEGP site. WSRC Emergency Management concurs that the proposed EP is practicable, and commits to continuing participation in any further development of the plans, including any required field demonstrations.

Richard G. Davis

~~Debra~~ Poutch RICHARD G. DAVIS
WSRC Emergency Management

cc: Document Services RTYPE: AR01
D. P. Burford
J. T. Davis
W. H. Lee
AR File No.: AR.01.01.05

Charles -

I had my manager sign since he is the Manager for Emergency Management and has the authority to make this commitment.

Dr Fowler

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## 13.6 Industrial Security

The footprint area for the two new Westinghouse AP1000 units is west of, and adjacent to, the existing units on the VEGP site. There will be a protected area encompassing the new units. Like the existing units, physical protection of the new units will be based on controlling access to the VEGP site and the new units (VEGP Units 3 and 4), screening operating personnel, monitoring security equipment, designing and arranging station features, and obtaining assistance from local law enforcement personnel. Once construction reaches conclusion on the first new unit, a Vehicle Barrier System will be implemented at the appropriate stand-off distance.

The characteristics of the VEGP Units 3 and 4 footprint are such that implementation of the applicable requirements of 10 CFR 73.55, *Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage*, and NRC Regulatory Guide 4.7, *General Site Suitability Criteria for Nuclear Power Stations*, as well as the post-9/11 NRC Orders, can be met. The VEGP site is sufficiently large to provide adequate distances between structures and the probable location of the security boundaries.

The VEGP site is bordered on the east by the Savannah River. For the existing units, SNC has an approved security program in place in compliance with the post-9/11 NRC Orders and in accordance with NEI 03-12, Template for Security Plan and Training and Qualification Plan. In the event that new units are added to the VEGP site, those requirements would continue to be met and would be extended to include the new units.

The final design of the VEGP Units 3 and 4 power block and supporting buildings would utilize design features as appropriate to assure that the existing security spatial distances outlined in the regulations above, as well as the Design Basis Threat requirements, are adequate. In accordance with 10 CFR 100.21(f), SNC will ensure that site characteristics are adequate to provide security plans and measures. The COL application would address the specific design features to assure site security as well as include the design of security monitoring equipment and methods to screen station operating personnel. A security assessment will be conducted as part of the COL application and will address all aspects of security for the new units.

There are no security hazards in the vicinity of the VEGP site. The VEGP site is located in Burke County in the State of Georgia. Written letters of agreement with the Burke County Sheriff and the Georgia State Patrol are currently in place to establish for law enforcement response in the event of a VEGP security (or radiological) emergency **(Burke County Sheriff 2004; Georgia State Patrol 2004)**. Burke County has mutual aid agreements with surrounding counties in place, if necessary, to provide support during VEGP emergencies.

## Section 13.6 References

**(Burke County Sheriff 2004)** Burke County Sheriff's Office letter of agreement for law enforcement support for VEGP security and radiological emergencies, dated April 15, 2004.

**(Georgia State Patrol 2004)** Georgia State Patrol letter of agreement for law enforcement support for VEGP security and radiological emergencies, dated April 22, 2004.

## 13.7 Fitness for Duty

A Fitness for Duty (FFD) program is implemented and maintained to meet the requirements contained in 10 CFR Part 26. The FFD program complies with the FFD requirements contained in 10 CFR Part 26 at the new plant construction site during the Limited Work Authorization (LWA) phase of the nuclear unit. This program will be implemented at the new plant construction site prior to LWA construction activities on safety- or security-related structures, systems, and components. A description of the FFD program that will be followed during LWA construction of VEGP Units 3 and 4 is contained in Appendix 13.7A. The FFD program for post-license construction and operation of VEGP Units 3 and 4 is described in the combined license (COL) application.

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# Appendix 13.7A

# Vogtle Electric Generating Plant Units 3 and 4

# Fitness for Duty Program

# During LWA Construction

# Revision 4

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# VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4 FITNESS FOR DUTY PROGRAM DURING LWA CONSTRUCTION

## 1 INTRODUCTION

This document provides Vogtle Electric Generating Plant (VEGP) Units 3 and 4 construction site entities a process to authorize and maintain a worker's status in the construction site entity Fitness for Duty (FFD) Program in order to allow an individual to work on a U.S. Nuclear Regulatory Commission (NRC) approved limited work authorization (LWA) construction site. It is acknowledged that entities implementing this guidance may be Southern Nuclear Operating Company (SNC), contractors/vendors (C/Vs), or other entities authorized by the NRC and shall hereafter be referred to as construction site entities.

## 2 PURPOSE AND SCOPE

This program is applicable to the VEGP Units 3 and 4 construction site entity and applies only to persons who will perform LWA construction activities and first level supervisors, at the location where the nuclear plant will be constructed and operated, on safety and security related structures, systems, and components (SSCs). This document ensures consistent application of regulations and is intended to serve as the FFD Program description for VEGP Units 3 and 4 LWA construction site as required in 10 CFR 26.401(b).

The FFD program described herein applies only to LWA construction activities that are performed at the location within the footprint of the new power reactor as well as the nearby areas where safety- and security-related SSCs will be installed and operated when the plant begins operation. The scope of LWA construction activities are described in the Vogtle Early Site Permit Application Site Safety Analysis Report Section 3.8.5. LWA construction activities conducted at facilities outside this prescribed area such as another location, city, state, or outside of the U.S. are not subject to the program described herein.

Personnel listed below shall be subject to the full operating plant FFD program that meets the requirements of 10 CFR 26, subparts A through H, N, and O.

- security personnel required by the NRC
- those who perform quality assurance/quality control/quality verification activities related to safety- or security-related construction activities
- individuals directly involved in witnessing or determining inspections, tests, and analyses and acceptance criteria (ITAAC) certification
- designated individuals to monitor the fitness of individuals
- individuals responsible for oversight and implementation of the licensee fitness-for-duty and access authorization programs
- second-level and higher supervisors and managers

## 3 RESPONSIBILITY

SNC is responsible to ensure that the applicable elements of 10 CFR 26 are implemented at the construction site. In ensuring this is completed, SNC may rely on program elements completed by another construction site entity program. Once it has been determined that an individual has provided a negative drug and alcohol test result, the individual may be eligible to gain access to the construction site. A construction site entity can maintain an individual in this status as long as the person remains in the construction site entity random FFD testing program for LWA construction, does not provide a positive drug or alcohol test result when tested, and is subject to a behavioral observation program. When an individual provides a positive drug or alcohol test, the construction site entity responsible for the test must notify SNC and the individual shall not be allowed access to the construction site without the approval of SNC.

Each construction site entity approving a C/V program shall ensure the latest revision of this document has been provided to each of its C/Vs for use and require that the criteria herein be met. Audits are used to assure that SNC and SNC-approved C/V programs supporting the fitness for duty program for the construction site meet regulatory requirements. Construction site entities are responsible for ensuring that program deficiencies are corrected.

## 4 DEFINITIONS

NOTE: These definitions expand upon but do not replace those found in regulatory documents. As used herein, any term that is not defined in this document but is defined in 10 CFR Part 26 has the meaning given in 10 CFR Part 26.

**Construction Site –** The defined physical location within the owner-controlled area (OCA) where the nuclear plant's security and safety related systems, structures, and components (SSCs) will be constructed and operated

**Contractor/Vendors –** Any company or individual not employed by the construction site entity that is providing work or services either by contract, purchase order, oral agreement, or other arrangement.

**Conviction** - A finding of guilt (including a plea of nolo contendere), or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug and/or alcohol statutes.

**Criminal Drug Statute** - A federal or non-federal, criminal statute involving the manufacture, distribution, dispensing, possession, or use of any illegal drug as defined in 10 CFR Part 26 and herein.

**First Level Supervisors –** The first level supervisory position that does not perform manual work.

**HHS-certified laboratory -** a laboratory that is certified to perform urine drug testing under the Department of Health and Human Services Mandatory Guidelines for Federal

Workplace Drug Testing Programs (the HHS Guidelines), which were published in the Federal Register on April 11, 1988 (53 FR 11970), and as amended, June 9, 1994 (59 FR 29908), November 13, 1998 (63 FR 63483), and April 13, 2004 (69 FR 19643).

**Illegal Drugs** - Any drug that is included in Schedules I to V of Section 202 of the Controlled Substances Act [21 U.S.C 812], but not when used pursuant to a valid prescription or when otherwise authorized by law.

**Legal Action -** A formal action taken by a law enforcement authority or court of law, including an arrest, an indictment, the filing of charges, a conviction, or the mandated implementation of a plan for substance abuse treatment in order to avoid a permanent record of an arrest or conviction, in response to any of the following activities:

- The use, sale, or possession of illegal drugs;
- The abuse of legal drugs or alcohol; or
- The refusal to take a drug or alcohol test.

**Under the Influence** – A determination that an individual is affected by drugs or alcohol in any detectable manner. The symptoms of influence include but are not confined to those consistent with aberrant behavior or obvious impairment of physical or mental abilities such as slurred speech or difficulty in maintaining balance.

**Management and Oversight** - The following position classifications are defined as management and oversight personnel:

- security personnel required by the NRC
- those who perform quality assurance/quality control/quality verification activities related to safety- or security-related construction activities
- individuals directly involved in witnessing or determining inspections, tests, and analyses (ITAAC) certification
- designated individuals to monitor the fitness of individuals
- individuals responsible for oversight and implementation of the licensee fitness-for-duty and access authorization programs
- second-level and higher supervisors and managers

**MRO (Medical Review Officer) –**a licensed physician who is responsible for receiving laboratory results generated by a HHS certified laboratory and who has the appropriate medical training to properly interpret and evaluate an individual's drug and validity test results together with his or her medical history and any other relevant biomedical information.

**Presumptive Positive Drug Test Result** – initial screen result that reaches or exceeds the screening cutoff whenever a test is required. This initial test requires a confirmatory drug test or alcohol test.

**SSC (Systems, Structures or Components)**

- *Safety-related SSCs* mean those structures, systems, and components that are relied on to remain functional during and following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, or the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the guidelines in 10 CFR 50.34(a)(1).
- *Security-related SSCs* mean those structures, systems, and components that SNC will rely on to implement the physical security and safeguards contingency plans that are required under 10 CFR 73.

## 5 DRUG AND ALCOHOL POLICY & PROCEDURES

### Drug and Alcohol Policy

Each construction site entity who implements this FFD program shall ensure that a clear, concise, written FFD policy statement is provided to individuals who are subject to the program. The policy statement must be written in sufficient detail to provide affected individuals with information on what is expected of them and what consequences may result from a lack of adherence to the policy. At a minimum, the written policy statement must:

- Describe the consequences of the following actions:
  i. The use, sale, manufacture, transfer, dispensing, distribution, or possession of illegal drugs on or off site,
  ii. The abuse of legal drugs and alcohol, and
  iii. The use, sale, purchase, transfer, dispensing, distribution, or possession of alcohol on site;

- Describe the requirement that individuals who are notified that they have been selected for random testing must report to the collection site within the time period specified by the licensee or other entity;

- Describe the actions that constitute a refusal to provide a specimen for testing, the consequences of a refusal to test, as well as the consequences of subverting or attempting to subvert the testing process;

- Prohibit the consumption of alcohol, at a minimum
  i. Within an abstinence period of 5 hours preceding the individual's arrival at the construction site, and
  ii. During the period of any tour of duty;

- Convey that abstinence from alcohol for the 5 hours preceding any scheduled tour of duty is considered to be a minimum that is necessary, but may not be sufficient, to ensure that the individual is fit for duty;

- Describe the consequences of violating the policy;

- Describe the individual's responsibility to report legal actions,

- Describe the responsibilities of all managers and supervisors including management and oversight individuals to report FFD concerns;

- Describe the individual's responsibility to report FFD concerns.

**Procedures**

Construction site entities shall develop, implement, and maintain written procedures that address the following topics:

- The methods and techniques to be used in testing for drugs and alcohol, including procedures for protecting the privacy of an individual who provides a specimen, procedures for protecting the integrity of the specimen, and procedures used to ensure that the test results are valid and attributable to the correct individual;

- The immediate and follow-up actions that will be taken, and the procedures to be used, in those cases in which individuals who are subject to the FFD program are determined to have:

  i. Been involved in the use, sale, or possession of illegal drugs;
  ii. Consumed alcohol to excess before or while constructing safety- or security-related SSCs, as determined by a test that accurately measures breath alcohol content (BAC);
  iii. Attempted to subvert the testing process by adulterating or diluting specimens (in vivo or in vitro), substituting specimens, or by any other means;
  iv. Refused to provide a specimen for analysis; or
  v. Had legal action taken relating to drug or alcohol use; and

- The process to be followed if an individual's behavior or condition raises a concern regarding the possible use, sale, or possession of illegal drugs on or off site; the possible use or possession of alcohol while constructing safety- or security-related SSCs; or impairment from any cause which in any way could adversely affect the individual's ability to safely and competently perform his or her duties.

- FFD documents, policies, and procedures ensure NRC guidance is met. In compliance with 10 CFR 26.417(a), these documents will be made available for NRC review at any time.

Written procedures must provide reasonable assurance that the individuals are fit to safely and completely perform their duties, and are trustworthy and reliable, as demonstrated by the avoidance of substance abuse.

**Training**

All individuals will receive FFD training as new employees and prior to initial granting of unescorted access to the construction site. Refresher training will be conducted at nominal 12-month intervals. All individuals will be trained in behavioral observation techniques per NRC requirements to be able to recognize behavior adverse to the safe construction and security of the facility, and to detect and report aberrant behavior that might reflect negatively on an individual's fitness for duty, trustworthiness, or reliability.

Managers and supervisors will be trained regarding their role and responsibility in implementing the program. Training will include the role of the medical and Employee Assistance Program staff, techniques for recognizing drugs and indication of the use, sale, or possession of drugs, behavioral observation techniques, and procedures for initiating corrective action including referrals for mandatory FFD evaluations. Managers and Supervisors will be trained regarding their role in documentation of behavioral observation. New supervisors will be trained within 3 months after initial supervisory assignment. Refresher training will be conducted at nominal 12-month intervals.

Management and Oversight individuals will be trained and tested in accordance with the requirements in 10 CFR 26.29.

## 5.1 USE, POSSESSION, OR SALE OF DRUGS OR ALCOHOL

### 5.1.1 Illegal Drugs

Using, selling, manufacturing, purchasing, transferring, dispensing, distributing, or possessing illegal drugs by any individual while on the construction site is strictly prohibited.

### 5.1.2 Alcohol

Using, selling, purchasing, transferring, dispensing, distributing, or possessing alcohol by an individual subject to this program while on a construction site is strictly prohibited.

Consumption of alcohol onsite or within 5 hours of performing construction work to safety-related or security-related SSCs is strictly prohibited. Abstinence from alcohol for the 5 hours preceding any scheduled work is considered to be the minimum that is necessary, but may not be sufficient, to ensure an individual is fit for duty.

Individuals who are called out to perform work outside their normal work hours shall be required by their supervisor to indicate whether alcohol has been consumed within the 5-hour pre-duty abstinence period. Employees may be required to be tested for alcohol upon reporting to work. Employees indicating they have consumed alcohol within this period may be further evaluated and/or tested prior to beginning a tour of duty. Employees reporting alcohol consumption within the 5 hour period must also be approved by appropriate management. No disciplinary action will be taken if the employee has informed his/her supervisor of alcohol consumption prior to reporting.

### 5.1.3 Reporting of Legal Actions

An individual subject to the provisions of this document is required to notify the construction site entity of any legal action involving drugs or alcohol as required by the construction site entity policies.

## 5.2 DISCIPLINARY ACTIONS

Individuals requiring access to the construction site shall sign a Consent Form (e.g., see Attachment A.), prior to gaining access, attesting to their understanding of the consequences for a violation of the FFD policy.

The construction site entity shall establish sanctions for FFD policy violations that, at a minimum, prohibit the individuals from being assigned to construct safety- or security-related SSCs unless or until SNC or other entity determines that the individual's condition or behavior does not pose a potential risk to public health and safety or the common defense and security.

## 5.3 DRUG AND ALCOHOL TESTING

The construction site entity shall employ urinalysis, breath tests or other methods as permitted by 10 CFR 26 to determine fitness for duty, including but not limited to pre-access, for-cause and random testing. At a minimum, the construction site shall test specimens for marijuana metabolite, cocaine metabolite, opiates (codeine, morphine, 6-acctylmorphine), amphetamines (amphetamine, methamphetamine), phencyclidine, adulterants, and alcohol, at the cutoff levels specified herein or comparable cutoff levels if specimens other than urine are collected for drug testing. An individual must consent to submit to such tests as a condition of access to the construction site and refusal to consent shall result in denial of access to the construction site.

Testing of urine specimens for drugs and validity, except validity screening and initial drug and validity tests that may be performed by a construction site entity testing facilities, must be performed in a laboratory that is certified by HHS for that purpose, consistent with its standards and procedures for certification. Any initial drug test performed by a construction site entity must use an immunoassay that meets the requirements of the Food and Drug Administration for commercial distribution. Urine specimens that yield presumptive positive, adulterated, substituted, or invalid initial validity or drug test results must be subject to confirmatory testing by the HHS-certified laboratory, except for invalid specimens that cannot be tested. Other specimens that yield presumptive positive initial drug test results must be subject to confirmatory testing by a laboratory that meets stringent quality control requirements that are comparable to those required for certification by the HHS.

Testing for alcohol will be conducted through breath measurement or using oral fluids. The initial test for alcohol performed at the construction site testing facility shall be conducted by a breath measurement device which meets the requirements of the National Highway Traffic Safety Administration (NHTSA) standards (49 FR 48855) and any applicable State of Georgia statutes or by using oral fluids (e.g., saliva) using acceptable

alcohol screening devices (ASDs) that are listed on the most recent version of NHTSA's Conforming Products List (CPL) for ASDs.

The following initial cutoff levels shall be used when testing specimens to determine whether they are negative for the indicated substances:

Initial Test Cutoff Levels

| Substance* | Cutoff level |
|---|---|
| Marijuana metabolites | 50 ng/ml |
| Cocaine metabolites | 300 ng/ml |
| Opiate metabolites | 2000** ng/ml |
| Phencyclidine | 25 ng/ml |
| Amphetamines | 1000 ng/ml |
| Alcohol (1) | 0.02% BAC |

(1) Applicable for breath measurement devices and ASDs.
* Construction site entities may specify more stringent cutoff levels as well as other illegal drugs as determined. Results shall be reported for both levels in such cases.
**25 ng/ml is immunoassay specific for free morphine.

Confirmatory testing for alcohol must be conducted using a breath measurement device.

Confirmatory testing for drugs or drug metabolites must be conducted by a HHS-certified laboratory.

Confirmatory Test Cutoff Levels

| Drug | Cut-off level |
|---|---|
| Marijuana metabolite | 15* ng/ml |
| Cocaine metabolite | 150** ng/ml |
| Opiates: Morphine | 2000 ng/ml |
| Opiates: Codeine | 2000 ng/ml |
| Opiates: 6-acetylmorphine | 10*** ng/ml |
| Phencyclidine | 25 ng/ml |
| Amphetamines: Amphetamine | 500 ng/ml |
| Amphetamines: Methamphetamine | 500**** ng/ml |
| Alcohol (1) | 0.01-0.04%***** BAC |

(1) Applicable for breath measurement devices and ASDs.
*Delta-9-tetrahydrocannabinol-9-carboxylic acid.
**Benzoylecgonine
*** Test for 6-AM when the confirmatory test shows a morphine concentration > 2,000 ng/ml.
**** Specimen must also contain amphetamine at a concentration ≥ 200 ng/ml

***** Cutoff level for confirmed positive will be determined using conditions specified in 10 CFR 26.103.

Testing for additional substances may be ordered on individuals at the direction of the Medical Review Officer for follow-up and for-cause FFD tests. All testing will be conducted in compliance with 10 CFR 26.405(f). Appropriate cut-off limits shall be established by construction site entities per the protocols of the certified Department of Health and Human Services laboratory. Testing methods will be chosen based on the additional substances being tested. Any individual subject to testing of additional substances at the direction of the MRO shall be informed of this requirement. In addition, construction site entities may specify more stringent cut-off levels. Results shall be reported for both levels in such cases.

**Construction Site Testing Facilities**

Construction site testing facilities shall have a supervisory individual responsible for day to-day operations and to supervise the testing technicians. The number of testing technicians required for the facility will be based on the needs of construction staffing and observation. The supervisory individual and testing technician(s) shall have at least a bachelor's degree in the chemical or biological sciences or medical technology or equivalent. They shall have training and experience in the theory and practice of the procedures used in the construction site testing facilities, resulting in their thorough understanding of quality control practices and procedures; the review, interpretation, and reporting of test results; and proper remedial actions to be taken in response to detecting aberrant test or quality control results. On a case by case basis construction site entities may use alternative collection and testing facilities as described below.

**Collector qualifications and responsibilities:**

The construction site entity shall ensure the following:

- Urine collector qualifications: Urine collectors shall be knowledgeable of the requirements of the construction site FFD policy and procedures and shall keep current on any changes to urine collection procedures. Collectors shall receive qualification training that meets the requirements of this paragraph and demonstrate proficiency in applying the requirements of this paragraph before serving as a collector. At a minimum, qualification training must provide instruction on the following subjects:

    i. All steps necessary to complete a collection correctly and the proper completion and transmission of the custody-and-control form;
    ii. Methods to address “problem” collections, including, but not limited to, collections involving “shy bladder” and attempts to tamper with a specimen;
    iii. How to correct problems in collections; and
    iv. The collector’s responsibility for maintaining the integrity of the specimen collection and transfer process, carefully ensuring the modesty and privacy of the donor, and avoiding any conduct or remarks that might be construed as accusatorial or otherwise offensive or inappropriate.

- Alcohol collector qualifications: Alcohol collectors shall be knowledgeable of the requirements of the construction site FFD policy and procedures and shall keep current on any changes to alcohol collection procedures. Collectors shall receive qualification training meeting the requirements of this paragraph and demonstrate proficiency in applying the requirements of this paragraph before serving as a collector. At a minimum, qualification training must provide instruction on the following subjects:

  i. The alcohol testing requirements of 10 CFR 26.405;
  ii. Operation of the particular alcohol testing device(s) [i.e., the the alcohol screening devices (ASDs) or Evidentiary Breath Test (EBTs)] to be used, consistent with the most recent version of the manufacturers' instructions;
  iii. Methods to address "problem" collections, including, but not limited to, collections involving "shy lung" and attempts to tamper with a specimen;
  iv. How to correct problems in collections; and
  v. The collector's responsibility for maintaining the integrity of the specimen collection process, carefully ensuring the privacy of the donor, and avoiding any conduct or remarks that might be construed as accusatorial or otherwise offensive or inappropriate.

**Alternative Collection and Testing**

Construction site entities who are subject to this procedure may rely on a local hospital or other organization that meets the requirements of 49 CFR 40, "Procedures for Department of Transportation Workplace Drug and Alcohol Testing Programs" (65-FR-41944; August 9, 2001) to collect specimens and conduct alcohol tests for the FFD program described herein.

## 5.4 EMPLOYEE ASSISTANCE PROGRAM

The construction site entity recognizes that problems of a personal nature could have an adverse effect on an employee's job performance. The goal of the Employee Assistance Program (EAP) is to provide employees with assistance for early intervention techniques that will improve the quality of their personal lives and prevent the development of job performance problems.

The Employee Assistance Program will provide assistance to any employee requesting services in the areas of alcohol abuse, substance abuse or any other problems.

Information concerning employee counseling will be protected in accordance with federal and state law, and will not be revealed to anyone outside the EAP program except as follows:

1. If disclosure is required by law.
2. If the EAP professional determines that the employee is a serious threat to themselves or to the safety of others.

3. If the EAP professional determines that the employee's condition is such that the employee should not be allowed access to the construction site, access to safeguards information, or be allowed to perform certain safety-sensitive job duties.
4. If the employee authorizes the release of the information to another party or individual.

# 6 DRUG AND ALCOHOL TESTING PROCEDURE

## 6.1 CONSENT FORM

Individuals are required to sign the Consent Form (Attachment A) as a condition of access to the construction site. Included in the consent form is the agreement to submit to periodic unannounced (random) testing during the course of their access to the construction site. Refusal to cooperate with or submit to such testing shall result in immediate termination of access to the construction site.

## 6.2 TESTING PROCEDURES

### 6.2.1 Pre-Access

Each worker who will construct or direct the construction of safety- or security-related SSCs shall have negative drug and alcohol test results prior to constructing or directing the construction of any safety- or security- related SSCs. These drug and alcohol tests must be administered no more than 30 days prior to the start of the worker's construction, or direction of the construction, of a safety- or security-related SSC.

### 6.2.2 For Cause

**Post Accident**

As soon as practical after an event involving a human error that was committed by an individual subject to this program where the human error may have caused or contributed to an accident. The construction site entity shall test the individual(s) who committed the error(s), and need not test individuals who were affected by the event but whose actions likely did not cause or contribute to the event. Individuals involved in a work-related accident shall be required to submit to a drug and alcohol test at the construction site testing facility.

In all cases treatment of an individual's illness or injury takes precedence over drug and alcohol testing.

For purposes of this policy, an "accident" is defined as the following:

- Work-related injury/illness – An injury or illness, resulting in an OSHA Recordable Incident.

- Work-related motor vehicle accident -- A significant on-site accident that occurs while an individual is in a vehicle performing construction site entity business, as defined in the construction entity's procedures.
- Significant property damage -- Damage, during construction, to any safety- or security-related SSC in excess of $100,000.

**Occupational Injury and Illness Resulting in an OSHA Recordable Incident**

A for cause test will be conducted when significant illness or personal injury occurs to an individual or another individual, which within 4 hours after the event is recordable under the Department of Labor standards contained in 29 CFR 1904.7, and subsequent amendments thereto, and results in death, days away from work, restricted work, transfer to another job, medical treatment beyond first aid, loss of consciousness, or other significant illness or injury as diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

- The injured individual must notify their onsite supervisor of the injury or illness if able.
- The construction site entity management shall make arrangements for the individual to submit for a drug and alcohol test at the construction site testing facility.
- The results of the drug and alcohol test shall be submitted to the construction site entity management.

**Significant Property Damage**

- The supervisor shall notify the respective construction site entity management that an incident has occurred that resulted in damage to safety- or security-related SSC in excess of $100,000.
- Construction site entity management shall make arrangements for the individuals involved in the damage to submit for a drug and alcohol test at the construction site testing facility.
- The results of the drug and alcohol test shall be submitted to the construction site entity management.

**Observed Behavior**

- If observed behavior or a physical condition creates a reasonable suspicion of possible substance abuse, the construction site entity shall perform drug and alcohol testing. The results must be negative before the individual returns to performing work on SSCs.
- If credible information is received that an individual is engaging in substance abuse, the construction site entity shall perform drug and alcohol testing.

- If the physical condition is the smell of alcohol with no other behavioral or physical indications of impairment, then only an alcohol test is required.
- For other indications of possible impairment that do not create a reasonable suspicion of substance abuse, the construction site entity may permit the individual to return to work only after the impairing or questionable conditions are resolved and the MRO has determined that the individual is fit to safely and competently perform his or her duties.
- The results of the drug and alcohol test shall be submitted to the construction site entity management.

**Custodial Arrest**

- Individuals reporting custodial arrests involving drugs or alcohol will be sent for a drug and alcohol test at the construction site testing facility.
- The construction site entity may permit the individual to return to work only after arrest conditions are resolved and the MRO has determined that the individual is fit to safely and competently perform his or her duties.

**Follow-Up Testing**

- Drug and alcohol testing will be performed as part of a follow-up plan to verify an individual's continued abstinence from substance abuse.
- The results of the drug and alcohol tests shall be submitted to the construction site entity management.

### 6.2.3 Random Drug and Alcohol Testing

**Random Selection and Frequency**

Random testing shall be accomplished for the construction site at the rate of 50 % of the population that is subject to FFD testing for the calendar year. Testing will be conducted during all types of work periods, including weekends and holidays at various times of the day throughout the calendar year. Test selection is statistically random and unannounced, so that all individuals in the population subject to testing have an equal probability of being selected and tested. Testing will be administered in a manner that provides reasonable assurance that individuals are unable to predict the time periods during which specimens will be collected. If an individual is selected and is not at work that day then another selection is made to replace that person.

Random testing for individuals currently authorized Unescorted Access to an operating power reactor shall be deemed adequate to maintain access to a construction site without being subject to additional random testing.

Random selection includes all individuals eligible for testing, for the construction site, on the date the random list is generated. Individuals to be tested (hereinafter the "subject") shall be chosen by use of a method which randomly selects the number of subjects from among the individuals eligible for testing for the

construction site. The construction site entity will develop procedures to detail the implementation of the random testing selection process as required herein.

**Notification Procedures**

At the time of random drug and alcohol testing, the following steps shall be taken:

- A record of the individuals selected for random testing shall be documented.
- The construction site entity shall notify the subject individuals through their supervisor and request they report to the construction site testing facility within one hour. If the individual fails to report within the one hour their supervisor, site management, and the MRO will be notified and appropriate actions will be taken based on the circumstances causing the failure to report.
- If an individual refuses to submit to the testing, the onsite supervisor shall attempt to inform the individual that access to the construction site shall be terminated unless he/she submits to testing.
- Individuals selected for testing will be immediately available to be selected the next time the random list is generated.
- Individuals not onsite the day the random selection is determined will not be subject to testing unless they are selected randomly again.
- When the construction site entity receives the results of the tests appropriate action shall be taken in the event of positive results.
- The laboratory forwards a written report to the construction site entity for the drug testing file.

## 6.3 SPECIMEN COLLECTION AND LABORATORY

Any initial test performed by a construction site testing facility or a HHS-certified laboratory, and the confirmatory test performed by a HHS-certified laboratory, shall use a process which meets the requirements of the Food and Drug Administration (FDA). Testing for drugs and drug metabolites will be conducted through the analysis of urine specimens or other process which meets the requirements of the FDA. Urine specimens that yield presumptive positive, adulterated, substituted, or invalid initial validity or drug test results must be confirmed using a HHS certified laboratory, except for invalid specimens that cannot be tested. Testing for alcohol will be conducted through breath measurement or oral fluids (e.g., saliva). The initial test for alcohol performed at the construction site testing facility shall be conducted by a breath measurement device which meets the requirements of the NHTSA standards (49 FR 48855) and to any applicable State of Georgia statutes, or by using oral fluids (e.g., saliva) using acceptable ASDs that are listed on the most recent version of NHTSA's CPL for ASDs.

Analytic methods used for testing for drugs will be urinalysis or any other method approved in 10 CFR 26. Testing indicates the presence of specific drugs or drug metabolites, but is not an indication of impairment due to drug use.

Initial analysis and validity testing may be performed by the construction site entity testing facility or by HHS-certified laboratories. Confirmatory analysis is performed by a laboratory that meets stringent quality control requirements that are comparable to those

required for certification by the HHS. Breath analysis may be performed at the construction site testing facility.

Initial cut-off levels shall be detailed in the construction site entity procedures. Those specimens that test negative on the initial test are not subject to further testing unless they are suspected of having been adulterated, substituted, invalid, or diluted.

Confirmatory testing must be performed on urine specimens after a presumptive positive, adulterated, substituted, or invalid initial validity or drug test result. Confirmatory drug testing is performed using gas chromatography (GC/MS) techniques. Breath analysis confirmation is performed by use of a breath measurement device. Specimens that are negative on the confirmatory test are reported as negative and are not subject to further testing unless they are suspected of having been adulterated, substituted, invalid, or diluted. If the confirmatory test is positive for morphine, a test for 6-monoacetylmorphine (6-MAM) shall be included in the confirmatory test for opiates to aid the MRO in determining whether the morphine is from legal drugs.

Specimens with a confirmed positive laboratory result for drugs, other than alcohol, will be evaluated by the MRO who will determine whether there is a legitimate medical reason for the presence of that drug in that specimen. This may involve review of medication history, physical examination and/or personal interview.

Vendor-operated testing facilities authorized by the construction site entity to conduct testing shall comply with the provisions of this program through the use of detailed procedures and shall be subject to assessment by the construction site entity or its representatives prior to implementation of the service and at a specified periodicity to assure continued effectiveness of service.

## 6.4 SPECIMEN PROCESSING

Construction site entity shall arrange for urine specimen collections and initial alcohol tests to be performed either at the construction site testing facility or at a nearby qualified facility. The testing should be done as soon as is reasonable after appropriate medical care if required.

Collection site personnel shall arrange to transfer the collected specimens to the HHS-certified laboratory. The construction site entity shall take appropriate and prudent actions to minimize false negative results from specimen degradation. Specimens that have not been shipped to the HHS-certified laboratory within 24 hours of collection, and any specimen that is suspected of having been substituted, adulterated, or tampered with in any way, must be maintained cooled to not more than 6 °C (42.8 °F) until they are shipped to the HHS-certified laboratory. Specimens must be shipped from the collection site to the HHS-certified laboratory or alternate testing facility as soon as reasonably practical but, except under unusual circumstances, the time between specimen shipment and receipt of the specimen at the alternate testing facility or HHS-certified laboratory should not exceed two business days.

The specimen collection and alcohol testing process will be detailed in the construction site entity procedures and will meet or exceed the requirements of specimen collection as

stated in 10 CFR 26. For alternative methods not described in 10 CFR 26, the construction site entity will develop detailed collection and specimen testing procedures.

## 6.5 POSITIVE RESULTS

A positive confirmatory breath alcohol test indicates a violation of the FFD program.

A presumptive positive drug test result does not always indicate a violation of the FFD program. All presumptive positive drug test results confirmed by the HHS certified laboratory as positive shall be reviewed by the MRO. The MRO will determine whether a legitimate medical reason exists for the positive result and will be the final determination as to whether an individual is in violation of the FFD program. If the MRO determines that there is a legitimate medical explanation for the confirmed positive result, the MRO shall report the result as negative. Substituted, adulterated or diluted test results will also be subject to MRO review for final determination. Invalid confirmatory drug and validity test results will be reviewed by the MRO to determine if the donor has violated the FFD policy.

Only the MRO can authorize the reanalysis of the original specimen, or the analysis of an aliquot of a split sample. The donor may request the MRO to authorize reanalysis. Such reanalysis shall be conducted by an HHS-certified laboratory.

The MRO shall report all positive results to the construction site entity management person responsible for the FFD program. The construction site entity shall ensure that appropriate action is taken as detailed in the construction site entity procedures. These procedures shall clearly state the consequences of violating FFD program requirements.

Employees who violate the FFD Policy by testing positive for drugs or alcohol are subject to discipline up to and including immediate discharge. In addition, employees who fail to notify supervision of factors that could adversely affect their fitness for duty, or who refuse to submit to FFD tests as required are subject to discipline up to and including immediate discharge.

## 6.6 REVIEW PROCESS

The construction site entity shall have an alternative review process that is objective and impartial. The construction site entity shall include a description of the process to be used in the procedures that implement this requirement. Construction site entity programs are not intended to modify, subjugate, or abrogate any review rights that currently exist for individuals with their respective employers. An individual who has been denied access to the construction site or whose access has been terminated due to a violation of the FFD program shall have the capability to:

- Be provided the basis for the denial of access;
- Have an opportunity to provide additional information, and;
- Be provided the opportunity to have the decision, together with any additional information, reviewed by another designated construction site entity manager who is equivalent or senior to and independent of the individual who made the decision to

deny or terminate access to the construction site due to the program violation. The determination from this independent review is final.

## 6.7 BEHAVIORIAL OBSERVATION PROGRAM

The construction site entity's Behavioral Observation Program is the primary means to detect behavior that may indicate possible use, sale, or possession of illegal drugs; use or possession of alcohol onsite or while on duty; or any physical impairment or any cause that, if left unattended, may constitute a risk to public health and safety or the common defense and security. Supervisors that are responsible for observing individuals subject to a Behavioral Observation Program shall report any FFD concerns about individuals to the personnel designated in the construction site entity's policy.

Supervisors that are responsible to observe individuals subject to the Behavioral Observation Programs must be trained to have sufficient awareness and sensitivity to detect degradation in performance which may be the results of being under the influence of any substance, legal or illegal, physical or mental impairment which in any way may adversely affect their ability to safely and competently perform their duties. Training shall communicate the expectation of promptly reporting noticeable changes in behavior or FFD concerns about other individuals to the construction site entity designated personnel for appropriate evaluation and action in accordance with the FFD policy.

## 6.8 RECORDKEEPING AND CONFIDENTIALITY

Personal information, whether electronic or hardcopy, must not be disclosed to unauthorized persons. The construction site entity shall obtain a signed consent that authorizes the disclosure of the personal information collected and maintained before disclosing the personal information, except for disclosures to the following persons who are authorized:

- Operating plant licensees and other licensees or construction site entities seeking the information as required for determinations of access to construction sites;
- NRC representatives;
- Appropriate law enforcement officials under court order;
- The subject individual or his/her representative who has been designated in writing;
- Licensee or construction site entity representatives who have a need to have access to the information in performing assigned duties, including audits of licensee, contractor or vendor programs, except where specifically excluded by regulation;
- Persons deciding matters on review or appeal;
- Persons who have the authority to change personal data in electronic records;
- Other persons pursuant to court order;
- Assigned MROs and MRO staff; or
- The presiding officer in a judicial or administrative proceeding that is initiated by the subject individual.

The construction site entity will establish and maintain a system of files and procedures that clearly indicate that test records and associated documentation shall be retained and used with the highest regard for individual privacy and confidentiality.

Records which must be retained and the retention period shall be identified in the construction site entity program procedures.

**Electronic Format Records**

For information stored or transmitted in electronic format, access to personal information will be controlled by password protection to control access to personal data and limiting data entry to each authorized individual's area of responsibility.

**Hardcopy Records**

Hard copy records shall be maintained in secured storage or lockable file cabinets when not in review. Access to the FFD area where files and file cabinets are contained is limited to those authorized above.

**Reporting** The licensee shall make the following reports:

- Reports to the NRC Operations Center by telephone within 24 hours after the construction site entity discovers any intentional act that casts doubt on the integrity of the FFD program and any programmatic failure, degradation, or discovered vulnerability of the FFD program that may permit undetected drug or alcohol use or abuse by individuals who are subject to the FFD program. These events must be reported under 10 CFR 26.417, rather than under the provisions of 10 CFR 73.71; and
- Annual program performance reports for the FFD program.

## 6.9 AUDITS

Construction site entities who implement an FFD program shall ensure that audits are performed to assure the continuing effectiveness of the FFD program, including FFD program elements that are provided by C/Vs, and the FFD programs of C/Vs that are accepted by SNC or other entity.

Construction site entity shall ensure that these programs are audited at a frequency that assures their continuing effectiveness and that corrective actions are taken to resolve any problems identified. Construction site entities may conduct joint audits, or accept audits of C/Vs conducted by others, so long as the audit addresses the relevant C/Vs' services.

Construction site entities need not audit HHS-certified laboratories or the specimen collection and alcohol testing services that meet the requirements of 49 CFR 40 on which the construction site entity may rely to meet the drug and alcohol testing requirements of 10 CFR 26.

The construction site entity will develop procedures to address the implementation of the audit requirements herein.

In accordance with 10 CFR 26.417, the construction site entity FFD program shall be made available for NRC inspection.

# ATTACHMENT A

# CONSENT FORM

The individual applying for access is required to sign a Consent that authorizes a construction site entity and its authorized agents to test the individual for drug and alcohol use as determined by the construction site entity.

The individual's signature on the Consent confirms that the individual has read and understands the Consent, and has voluntarily agreed to authorize the construction site entity and its authorized agents performing drug and alcohol testing and the individuals and entities releasing information to take the actions set out in the Consent. The Consent includes the following:

- Blank lines to be filled in with the name of the construction site entity and its authorized agent obtaining the Consent.
- Authorization to perform drug and alcohol testing for use in access decisions and the transfer of information among construction site entities and their authorized agents, and their employees who have a need-to-know.
- Authorization to use the information collected solely for the purpose of determining eligibility for access and subsequent work within the boundary of the nuclear power plant construction site.
- Authorization of the retention of collected information in files that are secure for a period required by NRC.
- Language to convey to the applicant that participation in drug and alcohol testing is voluntary. If an individual will not sign the consent or withdraws consent, or does not cooperate with the test process, the process cannot continue. In any of these cases, access to the nuclear plant construction site shall be denied or withdrawn immediately.
- The Consent serves to release construction site entities and their authorized agents, and the officers, employees, representatives, agents, and records custodians of each as well as the officers, employees, representatives, agents, and records custodians of any entity or individual supplying drug and alcohol testing services from any and all liability based on their authorized receipt, disclosure, and use of the information obtained based on the individual's consent.
- The individual's rights and responsibilities relative to reviewing the records collected pursuant to this consent.
- Notice that nothing in the Consent is to be construed to waive any right or responsibility that the individual granting consent, the construction site entity or if different from the construction site entity, the individual's employer may have under Section 211 of the Energy Reorganization Act of 1974, as amended. Section 211 addresses "protected activity" by workers in the nuclear industry.

# CONSENT FORM

_____ has my consent to drug and alcohol testing necessary to determine whether to grant me access to a nuclear power plant construction site and to allow me to maintain such access. The Nuclear Regulatory Commission (NRC) requires that this information be used in determining that an individual is fit-for-duty prior to granting and while maintaining access. The results of this determination may be available to other construction site entities. I understand the site FFD policy and consent to complying with that policy.

I understand that my information may be transferred, electronically or otherwise, to other construction site entities and contractor/vendors or the agents of each. This information shall include, but is not limited to:

- Name and Social Security Number;
- Dates when any of the following are completed: drug testing, alcohol testing;
- Dates when access has been authorized or terminated; and
- Dates associated with drug and/or alcohol follow-up testing, if applicable.

I authorize any individual, organization, institution, or entity that now has, or obtains in the future, drug and/or alcohol testing information about me (examples of which are provided in the above paragraph), to release any such information in order to perform the evaluation required for access.

I understand that my information obtained pursuant to this Consent shall be treated as confidential. The release of access-related information about me shall be limited to regulatory agencies and such personnel of construction site entities and their contractors/vendors who have been designated as having a "need to know" the information in order to do their jobs. These entities are listed in Section 6.8 of the site FFD program description.

I understand that all information about me in the database shall be maintained as securely as reasonably practicable for a period determined by the NRC.

I understand that, upon my written request to _____, and at no cost to me, I shall be provided, within ten (10) working days, with a printed copy of the information about me which is in the construction site entity files. If, after my review of such information, I can show that any of the information is incorrect or incomplete, such information shall be corrected and/or completed as soon as is reasonably practical.

I hereby release _____, and the officers, employees, representatives, agents, and records custodians of each as well as the officers, employees, representatives, agents, and records custodians of any entity or individual supplying or using such information from any and all liability based on their authorized receipt, disclosure, or use of the information obtained pursuant to this Consent and to determine my eligibility for construction site access.

I understand that this Consent is not intended to and does not affect any right or responsibility that I, my employer (if not _____), or _____ may have under Section 211 of the Energy Reorganization Act of 1974, as amended. I further understand that nothing herein (1) affects my right or my responsibility to bring potential safety concerns to my employer (if not _____), _____, or the NRC; or (2) prohibits me from participating in any proceeding or investigation regarding such a potential safety concern.

**I have read and understand this Consent and site FFD policy and authorize _____ to take such actions as are described therein. While I understand that construction site access is dependent upon my accepting the regulatory requirements of this FFD program, the statements made by me in this Consent and my decision to sign this Consent are voluntary. The statements were not induced by any promise nor have I been subjected to any threat, duress or coercion to sign this Consent.**
**[***Additional provisions required by applicable Georgia State law would be included here.*]

| _____ | _____ |
|---|---|
| *Applicant's Printed Name* | *Social Security No.* |
| _____ | _____ |
| *Applicant's Signature* | *Date* |

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