

September 21, 2009

MEMORANDUM TO: Nilesh Chokshi, Deputy Director  
Division of Site and Environmental Review  
Office of New Reactors

THRU: Gregory Hatchett, Chief  
Environmental Projects Branch 1  
Division of Site and Environmental Review  
Office of New Reactors

FROM: Mallecia Sutton, Project Manager */RA/*  
Environmental Projects Branch 1  
Division of Site and Environmental Review  
Office of New Reactors

SUBJECT: AUDIT EXECUTION PLAN FOR NEW AND SIGNIFICANT  
INFORMATION AUDIT FOR PLANT VOGTLE COMBINED  
LICENSE SUPPLEMENT ENVIRONMENTAL IMPACT  
STATEMENT

Attached is the new and significant audit plan for the Supplemental Environmental Impact Statement for Southern Nuclear Operating Company's (SNC) Combined License (COL) application for the proposed construction and operation of Units 3 and 4 at the Vogtle Electric Generating Plant. The purpose of this audit is to review the environmental information and analyses to determine if the design of the facility falls within the parameters specified in the early site permit, review any new and significant information for issues related to the impacts of construction and operation of the facility that were resolved in the early site permit proceeding and review SNC methodology in identifying new and significant information and ensure the process used is reasonable. The application for the COL was accepted for docketing on May 30, 2008. NRC staff will prepare a supplement to the Early Site Permit FEIS that was issued on August 26, 2009, as required by 10 CFR 51.92. The audit execution plan is attached for your information.

Docket No.: 52-025, 52-026

Enclosure: Audit Execution Plan

cc: See next page

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OFFICIAL RECORD COPY

Audit Execution Plan  
For  
New and Significant Information Audit

Plant Vogtle COL SEIS

September 28 – October 2, 2009



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Environmental Project Manager

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Date

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DSER Manager

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Date

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## 1. Project Description

The Combined Operating License (COL) application for the construction and operation of two AP-1000 reactors (designated Units 3 and 4) at the Vogtle Electric Generating Plant in Waynesboro, Georgia was submitted by Southern Nuclear Operating Company (SNC) to the NRC on March 31, 2008. The COL application referenced an Early Site Permit (ESP) application that had been docketed but not yet issued, as per 10 CFR 52.26(c). Previously, SNC submitted an application for an Early Site Permit for Units 3 and 4 at the Vogtle Electric Generating Plant on August 14, 2006.

**The ESP for the Vogtle Electric Generating Plant Site was authorized on August 26, 2009.**

## 2. New and Significant Information Audit Basis

10 CFR 51.75 (c)(1) requires that if a COL application references an early site permit, then the NRC staff shall prepare a draft supplement to the early site permit environmental impact statement (EIS) and that the supplement must be prepared in accordance with 10 CFR 51.92. In accordance with this regulation, the supplement to the ESP EIS shall incorporate by reference the final EIS for the ESP, contain no separate discussion of alternative sites, contain an analysis of all issues that were not resolved in the proceeding for the ESP, and include an analysis of resolved issues for which new and significant information has been identified. The New and Significant Information (N&SI) audit to be performed for the Plant Vogtle COL SEIS during September 29 through October 1, 2009 supports this last requirement.

## 3. New And Significant Information Audit Scope

The scope of this audit is the N&SI assessment that SNC performed in support of the Plant Vogtle COL Environmental Report.

The objectives for the NRC staff are:

- Review the environmental information and analyses to determine if the design of the facility falls within the site characteristics and design parameters specified in the early site permit
- Review any new and significant information for issues related to the impacts of construction and operation of the facility that were resolved in the early site permit proceeding
- Determine if the staff agrees with SNC's assessment of N&SI, i.e. if new info has become available for a particular area or issue, did SNC find it and did SNC then properly assess the significance of the new information
- Review SNC methodology in identifying new and significant information and ensure the process used is reasonable

- Obtain answers to Information Needs developed by the staff
- Determine if SNC followed the process set forth in the Plant Vogtle COL ER for N&SI

**4. Information and Other Materials Necessary for the New and Significant Information Audit**

NRC staff needs to review the following documentation prior to the audit:

- Appropriate ESP FEIS sections
- SNC's COL Environmental Report which contains a description of their New and Significant Info process in Section 1.7.2 (ML081050181)
- Trip Report from the Vogtle COLA Environmental Site Audit (Aug 2008) (ML0826620184)
- ASLB rulings on the contested (ML091730471) and uncontested (ML092290724) hearings

Information Needs are a series of questions and requests that SNC shall address with the staff during the audit. The listing of Information Needs for the N&SI audit is attached in Appendix A of this plan.

**5. Team Assignments**

<b>Audit Area</b>	<b>Staff</b>
Project Management	Mallecia Sutton – NRC Kim Leigh - PNNL
Aquatic Ecology	Nancy Kuntzleman – NRC Michael Masnik – NRC Beverly Miller - PNNL
Terrestrial Ecology	Nancy Kuntzleman – NRC Michael Sackschewsky - PNNL
Socio-economics, Environmental Justice, Need for Power	Daniel Mussatti – NRC Michelle Niemeyer – PNNL
Hydrology	Jill Caverly – NRC Phil Meyer - PNNL
Radiation	Steve Shaffer – NRC Tim Frye - NRC Mike Smith - PNNL
Land Use	John Fringer – NRC Paul Hendrickson –PNNL (via telecom)
Historical and Cultural Resources	FSME- NRC Tara O'Neil - PNNL
	Nilesh Chokshi - NRC Greg Hatchett- NRC Ann Hodgdon – NRC

## **6. Audit Schedule**

The N&SI audit schedule is attached is Appendix B of this plan.

## **7. Logistics**

The N&SI audit will be conducted at Plant Vogtle in Waynesboro, GA from September 29 to October 1, 2009. September 28, 2009 and October 2, 2009 will be travel dates.

It may be necessary to hold conference calls with audit team members who did not travel to the site but have Information Needs to be addressed. The schedule for these calls will be determined after discussions with team members and the applicant.

## **8. Deliverables**

The primary deliverable for this audit will be the site audit report which will be issued by November 13, 2009. Other deliverables may include additional information submitted by SNC in response to staff questions. If any additional information is determined to be needed, the schedule for submission by SNC will be documented in the site audit report.

Appendix A  
Information Needs



**Information Needs  
Vogtle COL Site Audit September 2009**

**Number = number of original information need.**

**Letter = information need added to the list of original information needs during the site audit.**

Info Needs #	Information Needed	I
<b>G-</b>	<b>General</b>	
<b>G-1</b>	Make available originals of all COL ER Revision 0 figures in .jpeg, .png or .tif format at a resolution of at least 300 dpi, and sized correctly. Please make available the electronic version of all ER figures in black and white.	Mi Sa Le
<b>G-2</b>	<p>Make available all Geographic Information System (GIS) and/or CAD data/databases used to support the ER analysis and results that contain any new information concerning existing and proposed conditions. The data should generally include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• All existing and proposed site infrastructure data (roads, buildings, intake/discharge pipelines, transmission lines, utility right-of-ways/transmission corridors, power blocks, switchyards, pipeline corridors, cooling and retention ponds, dams, canals, rail lines, monitoring/instrument stations, etc.)</li> <li>• Location data (official property boundary, official unit point location, exclusion area boundary, and other relevant boundaries on-site or regionally)</li> <li>• All surface and groundwater hydrologic data (watershed/sub basin boundaries, stream/river channels, springs, sinkholes, flood boundaries, reservoir boundary, site stormwater drainage, levees, hydrogeologic study boundaries, aquifers, potentiometric contours, well locations, surface water monitoring sites, etc.)</li> <li>• All terrestrial and aquatic ecological data (wetlands, ponds, terrestrial and aquatic sampling sites, wildlife/habitat areas, land use/land cover, and threatened and endangered species locations).</li> <li>• Terrain and bathymetric data (LiDAR, contours, river cross sections, bathymetric point samples, etc.)</li> <li>• Socioeconomic data (sector data at various radii, census blocks with attribute data including low income and minority data, State/county park recreational area - boundaries, trails, water trails, wildlife management units, traffic count data, commuter routes, etc.)</li> <li>• Geology and soils data (site and vicinity data, faults, folds, seismic activity, etc.)</li> </ul>	Mi Sa Le
<b>G-4</b>	Make available (for reading at the site audit) all documents currently in the electronic reading room.	Mi Sa Le
<b>G-5</b>	Provide a knowledgeable expert(s) to discuss contents of Section 11.2 of the COL ER.	Mi Sa Le
<b>G-6</b>	<p>Make available large wall map(s) at the site audit that show key features related to the proposed construction and preconstruction activities, including those in progress:</p> <ul style="list-style-type: none"> <li>• Proposed temporary and permanent facilities</li> <li>• Proposed construction laydown areas</li> </ul>	Mi Sa Le

Info Needs #	Information Needed	
	<ul style="list-style-type: none"> <li>• Proposed intake pipeline</li> <li>• Proposed intake structure</li> <li>• Proposed discharge pipeline</li> <li>• Proposed transmission corridor(s)</li> <li>• Property boundaries</li> <li>• Points of interest (e.g., nearby residences, gas pipelines, nearby industries, including quarries/mines)</li> <li>• Proposed rail line spur</li> <li>• Proposed haul roads</li> <li>• Proposed wetlands to be impacted (permanent &amp; temporary) by acreage &amp; type</li> </ul>	
G-7	Provide a knowledgeable expert(s) to discuss the irreversible commitments of resources as described in Section 11.5 of the COL ER.	Mit Sa Le
G-8	Provide a knowledgeable expert(s) to discuss Section 11.6 of the COL ER.	Mit Sa Le
G-9	Provide a knowledgeable expert(s) to discuss the current status of authorizations from consultations with Federal, State, Regional, and local governments as well as affected Native American tribal agencies	Mit Sa Le
LU-	<b>Land Use/Transmission Lines/Need for Power</b>	
LU-1	Provide a knowledgeable expert(s) to discuss whether there is any new information concerning the route of the planned transmission line beyond what is shown in Figure 4-1 in the ESP FEIS.	Pa
LU-2	Provide a knowledgeable expert(s) to discuss whether there is any new information related to zoning for the Vogtle site.	Pa
NFP-1	Provide a knowledgeable expert(s) to address any new and significant information as it relates to the need for power.	Pa
TE-	<b>Terrestrial Ecology</b>	
TE-2	Provide a knowledgeable expert(s) who can discuss any new information concerning threatened and endangered species surveys in disturbance areas, including any rail corridor upgrades that have not been surveyed.	An
TE-3	Provide any updates (correspondence/consultations/meeting summaries) with Georgia and South Carolina state and Federal agencies regarding status of environmental permits or authorizations (e.g. wetland jurisdictional determination from Army Corps, Section 10 and 404 permit from Army Corps, Section 401 water quality certification from Georgia DNR, Federal Depredation Permit, State Depredation permit), mitigation strategies, and monitoring requirements.	An
TE-4	Provide the isopleth map of salt deposition that is the output of any updated SACTI runs. If there is new information, provide a SME who can discuss any depositional changes on a seasonal basis and discuss the terrestrial communities that occur in the areas of deposition.	An
TE-5	Provide a knowledgeable expert(s) who can discuss any significant new projects (both public and private projects) occurring or planned in the vicinity of VEGP or the transmission right-of-way and that may contribute to cumulative impact on important species, wetlands, or other habitats.	An
TE-6	Provide a knowledgeable expert(s) who can discuss the applicant's process for reviewing new and significant information in relation to terrestrial issues.	An

Info Needs #	Information Needed	
TE-7	Provide a knowledgeable expert(s) who can discuss any changes to the total acreage, both permanent and temporary, that will be disturbed during construction, including disturbance for any rail upgrades. This person should be able to describe any changes in total number of acres disturbed and changes in total acres by habitat type between the ESP and the COL.	An
TE-8	Provide a knowledgeable expert(s) that can discuss any changes to the location of the barge slip or any other structures along the river (e.g., cooling water intake structure).	An
TE-9	Provide a knowledgeable expert(s) to discuss the recent upgrades to the rail spur and any projected upgrades to the rail corridor that may be needed.	An
TE-10	Provide a knowledgeable expert(s) to discuss the Candidate Conservation Agreement (gopher tortoise reintroduction)	An
TE-11	Provide a knowledgeable expert(s) to discuss any significant new information concerning dredging of the Savannah River during construction (including the Federal navigation channel (FNC) and from the barge facility to the FNC) and disposal locations of possible dredged material.	An
TE-12	Provide a knowledgeable expert(s) to discuss any changes in wetland acreage to be disturbed and indirect impacts to wetlands, based on any changes to the site plan.	An
TE-13	Provide a knowledgeable expert(s) to discuss any new information concerning the status of the proposed transmission line review.	An
TE-14	Provide a knowledgeable expert(s) to discuss any new information concerning construction dewatering, specifically related to Mallard Pond and the stream below the pond.	An
TE-15	Provide a knowledgeable expert(s) to discuss any new information concerning the preconstruction land clearing activities that have already taken place onsite.	An
<b>AE-</b>	<b>Aquatic Ecology</b>	
AE-1	Provide a knowledgeable expert(s) to discuss any recent upgrades to the rail spur and any projected upgrades to the rail corridor and any associated impacts to aquatic resources.	Be
AE-2	Provide a knowledgeable expert(s) to discuss the status of environmental permits/authorizations and any updates (correspondence/consultations/meeting summaries) from the Georgia and South Carolina state agencies as well as any Federal agencies (e.g., Section 10 and 404 permit from Army Corps, Federal depredation permit, Georgia DNR Section 401 water quality certification, Georgia DNR general permit for stormwater discharges, state depredation permit). Make available copies of environmental permits/authorizations obtained thus far.	Be
AE-3	Provide a knowledgeable expert(s) to discuss the process for reviewing new and significant information in relation to aquatic ecology issues, including fish spawning in the vicinity of the VEGP site, shortnose sturgeon, and freshwater mussels.	Be
AE-4	Provide a knowledgeable expert(s) to discuss any changes to the location of the barge slip or any other structures along the river (e.g., cooling water intake structure) and any changes in total acreage and habitats (both aquatic and terrestrial) disturbed.	Be
AE-5	Provide a knowledgeable expert(s) to discuss any significant new information concerning dredging of the Savannah River during construction (including the Federal navigation channel (FNC) and between the barge facility and the FNC) and disposal locations of possible dredged material. Make available copies of associated correspondence with regulatory agencies.	Be
AE-6	Provide a knowledgeable expert(s) to discuss any significant new information regarding the bathymetry of the Savannah River in the vicinity of the intake and barge slip, between the barge slip and the FNC, and within the FNC.	Be

Info Needs #	Information Needed	
AE-7	Provide a knowledgeable expert(s) to discuss any significant new information concerning the status of land clearing activities and stormwater management facilities, especially as they relate to aquatic resources (e.g., Mallard Pond).	Be
AE-8	Provide a knowledgeable expert(s) to discuss any significant new projects (both public and private projects) occurring or planned in or along the Savannah River that may contribute to cumulative impact on important species or aquatic habitats	Be
AE-9	Provide a knowledgeable expert(s) to discuss any modifications to the design of the cooling water intake structure that have the potential to affect aquatic resources (e.g., flow velocity in the intake canal, intake flow rates, hydraulic zone of influence, blowdown flow rates).	Be
S/EJ-	<b>Socioeconomics/Environmental Justice/Cost-Benefit</b>	
S/EJ-1	Provide a knowledgeable expert(s) who can address new and significant information as it applies to the socioeconomic aspects of the region. This includes zoning, infrastructure, housing, transportation, taxes and economy.	Mit
S/EJ-2	Provide a knowledgeable expert(s) with knowledge of any new outreach activities to various communities in the region.	Mit
S/EJ-3	Provide contact information in regards to such outreach activities and all references for staff review.	Mit
CB-1	Provide a knowledgeable expert(s) to address new and significant information as it relates to benefits and costs.	Mit
CR-	<b>Cultural Resources</b>	
CR-1	Make available any consultation correspondence between applicant, Tribes, SHPO and interested parties regarding the COLA, if any.	EII Ke
CR-2	Make available the MOA that is being developed for impacts to 9BK416 resulting from the intake structure and discuss the status and purpose of MOA and identify the signatories.	EII Ke
CR-3	Provide a knowledgeable expert(s) to discuss details of the site disturbance in relation to cultural resources surveys and known cultural resources, and to discuss whether new areas need to be disturbed and therefore inventoried for cultural resources. (If so, staff requests a tour to new sites if impacted).	EII Ke
CR-4	Provide a knowledgeable expert(s) to discuss any change in borrow pit location that may impact cultural resources.	EII Ke
CR-5	Provide a knowledgeable expert(s) to discuss any change in the location or dimensions of the intake structure and its impact to cultural resources.	EII Ke
CR-6	Provide a knowledgeable expert(s) to discuss any increase in land acreage to be disturbed and the effect on cultural resources.	EII Ke
CR-7	Provide a knowledgeable expert(s) to discuss any modifications to the barge slip (including dredging) and the impacts to cultural resources.	EII Ke
CR-8	Provide a knowledgeable expert(s) to discuss any plans to avoid 9BK423.	EII Ke
MET-	<b>Meteorology</b>	
MET-1	Provide a knowledgeable expert(s) to discuss the new and significant information review for Section 2.3 (Meteorology and Air Quality), including any changes to the EAB, LPZ, or site receptors (nearest garden, goat, cow) that might change the site X/Q's or D/Q's.	Jel

Info Needs #	Information Needed	
MET-2	Provide a knowledgeable expert(s) to discuss whether there are any changes in expected air-related emissions, either from the cooling towers or supplementary systems, in going to Rev 17 of the DCD.	Je
RHH-	<b>Radiological Human Health</b>	
RHH-1	Provide a knowledgeable expert(s) that can discuss any significant new information concerning onsite management of LLW, including any plans for an additional radwaste storage facility.	Mi
RHH-2	Provide a knowledgeable expert(s) to discuss any recent revisions to the Offsite Dose Calculation, including any changes that give consideration to the proposed dairy farm to be located approximately 6 miles to the south of the VEGP site.	Mi
RHH-3	Provide a knowledgeable expert(s) to discuss 2006–2008 annual effluent release reports for existing Units 1 and 2 at the VEGP site.	Mi
RHH-4	Provide a knowledgeable expert(s) to discuss how changes from AP1000 DCD Revision 15 to DCD Revision 17 might affect the radiological health analyses for normal operations.	Mi
ACC-	<b>Accidents</b>	
ACC-1	Provide a knowledgeable expert(s) to discuss any changes to the AP1000 design basis accident analyses based on AP1000 DCD Revision 17.	Va
ACC-2	Provide a knowledgeable expert(s) to discuss severe accident consequence assessments based on updated site information and any revisions to severe accident source terms for AP1000 DCD Revision 17.	Va
ACC-3	Provide access to the input to and output from a revised severe accident consequence assessment (MACCS runs), if available.	Va
ACC-4	Provide a knowledgeable expert(s) who can discuss possible changes in release category frequency that might be associated with an updated PRA for the AP1000 based on DCD Revision 17.	Va
ACC--5	Provide a knowledgeable expert(s) who can discuss how design changes from AP1000 DCD Revision 15 to DCD Revision 17 might affect the SAMDA analysis.	Va

The PNNL staff did not have any information needs for alternatives, hydrology, geology, nonradiological human health, site and technical overview, or transportation.

Appendix B  
Audit Schedule

Plant Vogtle COL  
New and Significant Information Audit  
9/28/09 – 10/2/09

**Monday, September 28, 2009**

- AM Travel day for all participants
- PM 8:00 pm – Brief team meeting in lobby of Wingate Inn, Augusta, GA to discuss following day activities.

**Tuesday, September 29, 2009**

- AM 6:45 am - Meet in lobby of Wingate Inn, travel to Plant Vogtle site
- 8:00 am – Introductory meeting and general discussion on SNC's new and significant information process
- 10:00 am – Site Tour
- PM 12:00 pm – Lunch
- 1:00 pm – technical area breakout sessions
- 4:30 pm – NRC staff debrief meeting, discussion of: 1) what was accomplished in breakout sessions; 2) status of Information Needs; 3) issues or concerns
- 5:00 pm – meeting with SNC to discuss any issues from the day's activities

**Wednesday, September 30, 2009**

- AM 6:45 am - Meet in lobby of Wingate Inn, travel to Plant Vogtle site
- 8:00 am – general meeting for announcements, schedule or logistics changes
- 8:30 am – walking tour for terrestrial/aquatic ecology personnel, tour of the disturbance areas, including the borrow area, spoils area, proposed

intake line, onsite portion of the new transmission line (T-line)<sup>1</sup>, simulator

building and strip pile (a quick tour of the habitats associated with the disturbance footprint), continuation of breakout sessions for all other technical specialties

PM 12:00 – Lunch

1:00 pm – Continuation of breakout sessions

4:30 pm – NRC staff debrief meeting, discussion of: 1) what was accomplished in breakout sessions; 2) status of Information Needs; 3) issues or concerns

5:00 pm – meeting with SNC to discuss any issues from the day's activities

#### **Thursday, October 1, 2009**

AM travel day for those staff members finished with their reviews, otherwise:

6:45 am - Meet in lobby of Wingate Inn, travel to Plant Vogtle site

8:00 am – general meeting for announcements, schedule or logistics changes

8:30 am – continue breakout sessions as needed and then close out with NRC Environmental Project Manager and PNNL Team Leader

PM 12:00 pm – Lunch

1:00 pm - continue breakout sessions as needed and then close out with NRC Environmental Project Manager and PNNL Team Leader

Scheduled as needed - meeting with SNC to discuss any issues from the team close out meetings

#### **Friday, October 2, 2009**

Travel day for remainder of audit team.

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<sup>1</sup> includes touring T-line stream crossings, including: 1) streams the new T-line might cross; and 2) an existing T-line stream crossing to see an example of GPC maintenance practices



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