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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

September 30, 2009

Stan Blanton
BALCH & BINGHAM, LLP
1710 6th Avenue North
Birmingham, AL 35203

Ann Hodgdon
Nuclear Regulatory Commission
Office of Counsel
1155 Rockville Pike, Stop O-15 D21
Rockville, MD 20852

Re: First Supplemental Disclosures for Contention SAFETY-1; *Southern Nuclear Operating Co.* (COL for Plant Vogtle Units 3 and 4), Docket Nos. 52-025-COL and 52-026-COL

Dear Mr. Blanton and Ms. Hodgdon:

Pursuant to 10 C.F.R. § 2.336 and the Atomic Safety and Licensing Board (the "Board") August 17, 2009 Memorandum and Order (Ruling Regarding Joint Motion on Mandatory Disclosures and Request for Additional Scheduling Information) (the "Disclosure Order"), Center for a Sustainable Coast, Savannah Riverkeeper, Southern Alliance for Clean Energy, Atlanta Women's Action for New Directions, and Blue Ridge Environmental Defense League (collectively, "Joint Intervenors") hereby provide the required mandatory disclosures relevant to Joint Intervenors' admitted contention, SAFETY-1.

1. Expert Witnesses and Documents

Except as set forth in the Joint Intervenors Initial Mandatory Disclosures dated August 31, 2009, ("Initial Disclosures") Joint Intervenors have not engaged any experts upon whom Joint Intervenors intend to rely upon as witnesses.

Moreover, neither Dr. Makhijani nor Ms. D'Arrigo has yet developed analysis or authority relevant to the admitted contention and upon which either intends to base his or her opinion or testimony. Pursuant to Joint Intervenors' continuing duty of disclosure under 10 C.F.R. § 2.336(d) and the Disclosure Order, Joint Intervenors will disclose such information as either Dr. Makhijani or Ms. D'Arrigo identifies and produces it.

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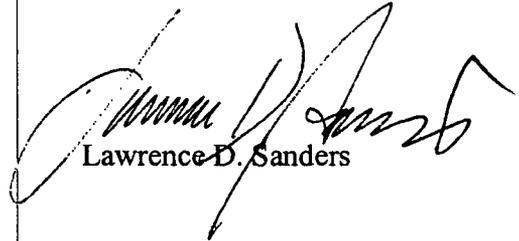
DS-03

2. Data Compilations or Tangible Things

Except as set forth in their Initial Disclosures, Joint Intervenors have no documents, data compilations or tangible things relevant to the admitted contentions in their possession. As required under the Disclosure Order and 10 C.F.R. § 2.336(d), Joint Intervenors will update these disclosures if they obtain any relevant documents, data compilations or tangible things.

Please do not hesitate to contact me should you have any questions or require further information.

Very truly yours



Lawrence D. Sanders

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before the Licensing Board:

G. Paul Bollwerk, III, Chairman
Nicholas G. Trikouros
Dr. James Jackson

In the Matter of)

) Docket Nos. 52-025-COL and 52-026-COL

Southern Nuclear Operating Company)

) ASLBP No. 09-873-01-COL-BD01

Vogtle Electric Generating Plant,)
Units 3 and 4)

) September 30, 2009

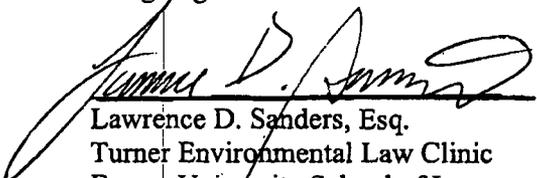
CERTIFICATION OF LAWRENCE D. SANDERS

Pursuant to 10 C.F.R. § 2.336(c), I, Lawrence D. Sanders, an attorney, hereby certify as follows:

1. I am an attorney employed by the Turner Environmental Law Clinic, located at Emory University School of Law, 1301 Clifton Road, Atlanta, Georgia 30322, and I am one of the counsel for Joint Intervenors in the above-captioned docket.
2. Included with this certification are the disclosures required under 10 C.F.R. § 2.336 for the Joint Intervenors in the above-captioned docket.
3. To the best of my knowledge, the attached disclosures include all relevant materials required by 10 C.F.R. § 2.336 and are accurate and complete as of the date of this certification.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 30, 2009


Lawrence D. Sanders, Esq.
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Hearing Docket

From: Sanders, Lawrence D [lawrence.sanders@emory.edu]
Sent: Wednesday, September 30, 2009 5:50 PM
To: OCAAMAIL Resource; Bollwerk, Paul; Trikouros, Nicholas; 'jackson538@comcast.net'; Jackson, James; 'mcaston@southernco.com'; Docket, Hearing; Moulding, Patrick; Price, Sarah; 'ksutton@morganlewis.com'; 'sfrantz@morganlewis.com'; 'pbessette@morganlewis.com'; 'deckert@morganlewis.com'; 'robert.haemer@pillsburylaw.com'; Goldstein, Mindy; 'jxb@nei.org'
Cc: Blanton, Stan; Moore, C. Grady; LeJeune, Peter; 'DANAWILL@SOUTHERNCO.COM'
Subject: RE: Southern Nuclear's First Supplemental Disclosures
Attachments: Intervenors First Supplemental Disclosures.pdf

Please find attached Joint Intervenors' First Supplemental Disclosures relating to the admitted contention in Docket Nos. 52-025-COL and 52-026-COL. We are sending a hard copy to counsel for the applicant and NRC Staff via First Class mail.

Larry Sanders, Acting Director
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"DANAWILL@SOUTHERNCO.COM" <DANAWILL@southernco.com>

Date: Wed, 30 Sep 2009 17:50:22 -0400

Subject: RE: Southern Nuclear's First Supplemental Disclosures

Thread-Topic: Southern Nuclear's First Supplemental Disclosures

Thread-Index: AcpCD06cdtUnNM/pTy2jGPCPnc8HygACGguw

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