

Southern Nuclear  
Operating Company, Inc.  
1000 Peachtree Street, N.E.  
Atlanta, Georgia 30309  
404.333.3333  
www.southernnc.com

October 27, 2009



*Energy to Serve Your World*  
NL-09-1658

Docket Nos.: 50-321 50-348 50-424 52-025  
50-366 50-364 50-425 52-026

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant  
Comments on Advanced Notice of Proposed Rulemaking for  
Performance-Based Emergency Core Cooling System Acceptance Criteria

Ladies and Gentlemen:

The Nuclear Energy Institute (NEI) has prepared comments concerning the advanced notice of proposed rulemaking for performance based emergency core cooling system acceptance criteria. This letter is to advise that Southern Nuclear Operating Company (SNC) endorses the comments submitted by NEI in their letter dated October 26, 2009 and signed by James H. Riley.

Re-emphasizing NEI's position, SNC believes that the proposed rulemaking is proceeding without sufficient technical basis for some of the proposed conceptual changes. While there appears to be some benefit from the new rulemaking provisions associated with cladding, the uncertainty in the remaining portions of the proposed rule does not justify moving forward until there is further testing and discussion.

Sincerely,

A handwritten signature in black ink that reads "Mark J. Ajluni". The signature is written in a cursive style.

M. J. Ajluni  
Nuclear Licensing Manager  
MJA/PAH/lac

U. S. Nuclear Regulatory Commission

NL-09-1658

Page 2

cc: Southern Nuclear Operating Company

Mr. J. T. Gasser, Executive Vice President

Mr. J. A. Miller, Executive Vice President, Nuclear Development

Mr. J. R. Johnson, Vice President – Farley

Mr. D. R. Madison, Vice President – Hatch

Mr. T. E. Tynan, Vice President – Vogtle

Ms. P. M. Marino, Vice President – Engineering

Mr. D. H. Jones, Site Vice President, Vogtle 3 & 4

RType: Farley=CFA04.054; Hatch=CHA02.004; Vogtle=CVC7000

U. S. Nuclear Regulatory Commission

Mr. L. A. Reyes, Regional Administrator

Mr. R. E. Martin, NRR Project Manager – Farley

Ms. D. N. Wright, NRR Project Manager – Hatch

Ms. D. N. Wright, NRR Project Manager – Vogtle

Mr. E. L. Crowe, Senior Resident Inspector – Farley

Mr. J. A. Hickey, Senior Resident Inspector – Hatch

Mr. M. Cain, Senior Resident Inspector – Vogtle

Mr. F. M. Akstulewicz, Deputy Director Div. of Safety Systems & Risk  
Assessment