

## Hearing Docket

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**From:** Conduff, Linda [lconduff@balch.com]  
**Sent:** Wednesday, March 31, 2010 10:40 AM  
**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'; 'robert.haemer@pillsburylaw.com'; 'lsande3@emory.edu'; 'magolds@emory.edu'; 'jxb@nei.org'  
**Cc:** Blanton, Stan; Moore, C. Grady; LeJeune, Peter; 'DANAWILL@SOUTHERNCO.COM'; Chuck Pierce; 'agaughtm@southernco.com'; Pilcher, Chad  
**Subject:** COL for Vogtle Units 3 and 4  
**Attachments:** 3-31-2010 Disclosures.pdf

Attached is a letter and affidavit regarding Southern Nuclear's Supplemental Disclosures for March 31, 2010.

**Linda Conduff**  
**Legal Assistant to Peter LeJeune, Chad Pilcher and Millie Ronnlund**  
**Balch & Bingham LLP**  
1901 Sixth Avenue North  
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DOCKETED  
USNRC

March 31, 2010 (10:40am)

OFFICE OF SECRETARY  
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10:40:06 -0400

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X-SBRS: 5.3

X-MID: 12791469

X-fn: 3-31-2010 Disclosures.pdf

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-0500

From: "Conduff, Linda" <lconduff@balch.com>

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"ngt@nrc.gov" <ngt@nrc.gov>, "jackson538@comcast.net"  
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"mcaston@southernco.com" <mcaston@southernco.com>,  
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CC: "Blanton, Stan" <SBLANTON@balch.com>, "Moore, C. Grady"  
<GMOORE@balch.com>, "LeJeune, Peter" <plejeune@balch.com>,  
"DANAWILL@SOUTHERNCO.COM" <DANAWILL@SOUTHERNCO.COM>, Chuck

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<CRPIERCE@Southernco.com>, "agaughtm@southernco.com"  
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Date: Wed, 31 Mar 2010 09:40:02 -0500

Subject: COL for Vogtle Units 3 and 4

Thread-Topic: COL for Vogtle Units 3 and 4

Thread-Index: AcrQ4AwZd/1vDAxWQumMyVxJ58cjgg==

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Return-Path: lconduff@balch.com



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March 31, 2010

**VIA FEDEX**

Ann P. Hodgdon, Esq.  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
1155 Rockville Pike, Stop O-15 D21  
Rockville, MD 20852-0001

Lawrence D. Sanders, Esq.  
Turner Environmental Law Clinic  
Emory University School of Law  
1301 Clifton Road  
Atlanta, GA 30322

**Re: Disclosures Pursuant to 10 CFR § 2.336 for Contention SAFETY-1;  
Southern Nuclear Operating Co. (COL for Vogtle Units 3 and 4), Docket Nos.  
52-025-COL and 52-026-COL**

Dear Ms. Hodgdon and Mr. Sanders:

Pursuant to 10 CFR § 2.336 and the agreement between the parties as set forth in the Atomic Safety and Licensing Board's ("ASLB") Order of August 17, 2009 regarding mandatory disclosures ("August 17 Order"), Southern Nuclear Operating Company, Inc. ("Southern Nuclear") is providing this update concerning the disclosures for Contention SAFETY-1, admitted by the ASLB's Order of March 5, 2009. Also attached is a supporting affidavit of Mr. Charles R. Pierce, AP1000 Licensing Manager for Southern Nuclear.

There were no documents and/or data compilations in the possession, custody, or control of Southern Nuclear (including its applicable affiliates and contractors) that were relevant to the admitted contention, and therefore, no documents are being disclosed.

Please do not hesitate to contact me if you have any questions or need any further information.

Sincerely,

Chad A. Pilcher

Attachments

**UNITED STATES OF AMERICA**  
**NUCLEAR REGULATORY COMMISSION**  
**Before the Atomic Safety and Licensing Board**

|  |   |                            |
|--|---|----------------------------|
| In the Matter of                           | ) | Docket Nos. 52-025-COL and |
| Southern Nuclear Operating Company         | ) | 52-026-COL                 |
| (COL for Vogtle Electric Generating Plant, | ) |                            |
| Units 3 and 4)                             | ) | March 31, 2010             |

**CERTIFICATION OF SUPPLEMENTAL DISCLOSURES**  
**AFFIDAVIT OF CHARLES R. PIERCE**

County of Shelby    )  
                                  )  
State of Alabama    )

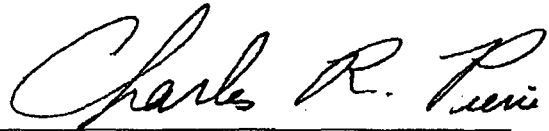
I, **CHARLES R. PIERCE**, being duly sworn according to law, depose and state the following:

I am the AP1000 Licensing Manager for Southern Nuclear Operating Company, Inc. ("Southern Nuclear"). My business address is 42 Inverness Center Parkway, Birmingham, Alabama 35242. I am authorized to provide this certification on behalf of Southern Nuclear.

To the best of my knowledge, information and belief, Southern Nuclear's disclosures in the above captioned proceeding contain all materials required to be disclosed by 10 C.F.R. § 2.336(a), as modified by the Atomic Safety and Licensing Board's Order of August 17, 2009 (Ruling Regarding Joint Motion on Mandatory Disclosures and Request for Additional Scheduling), that were identified as relevant


through a search of the information and documentation reasonably available to and under the possession, custody, or control (including its applicable affiliates and contractors) of Southern Nuclear. Further, to the best of my knowledge, information and belief, and based on the review of information and documentation currently reasonably available to and under the possession, custody, or control of Southern Nuclear, these disclosures are accurate and complete as of this date.

Further, the affiant sayeth not.



CHARLES R. PIERCE

SWORN TO and SUBSCRIBED before me this the 31<sup>st</sup> day of March, 2010.

  
Deloral A. Jaworski  
Notary Public

My commission expires October 24, 2012