



Mark D. Rauckhorst  
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Plant Vogtle 3&4

Southern Nuclear  
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January 25, 2018

Docket Nos.: 52-025  
52-026

ND-18-0034

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

Mr. Fred Brown  
Director, Office of New Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Vogtle Electric Generating Plant – Units 3 and 4  
Combined License (COL) Operational Programs and  
Other License Conditions Implementation Schedule

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued Combined Licenses (COLs) NPF-91 and NPF-92 to Southern Nuclear Operating Company (SNC) pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 52.97, "Issuance of combined licenses," on February 10, 2012.

Two license conditions require SNC to submit, no later than twelve months after issuance of the COL, the following:

- A schedule for implementation of the operational programs listed in the Final Safety Analysis Report Table 13.4-201, including the associated estimated date for initial loading of fuel (COL section 2.D.(11))
- A schedule for implementation of the license conditions listed in COL section 2.D.(12)(f)1-9

In accordance with the license conditions, the schedule shall be updated every six months until twelve months before scheduled fuel loading, and every month thereafter until each license condition has been fully implemented.

Enclosure 3 contains the updated schedule. This information is current as of January 23, 2018. As is typical with a construction project, the schedule information is dynamic in nature.

SNC's COL Operational Programs and Other License Conditions Implementation Schedule contains confidential commercial information. Pursuant to 10 CFR 2.390, SNC requests that the

specified information be withheld from public disclosure. In support of this request for withholding, SNC has attached to this letter the following documents:

Enclosure 1 contains an Affidavit for withholding executed by SNC and prepared in accordance with 10 CFR 2.390, which specifies the confidential commercial information sought to be withheld and the basis on which the information may be withheld.

Enclosure 2 contains the public, redacted version of SNC's COL Operational Programs and Other License Conditions Implementation Schedule.

Enclosure 3 contains the non-public, non-redacted version of SNC's COL Operational Programs and Other License Conditions Implementation Schedule.

Enclosure 4 contains the public, redacted version of SNC's Preoperational Test Procedure Completion Schedule.

Enclosure 5 contains the non-public, non-redacted version of SNC's Preoperational Test Procedure Completion Schedule.

Enclosure 6 contains a Confidential Commercial Information Notice.

SNC requests that Enclosure 3, COL Operational Programs and Other License Conditions Implementation Schedule, and Enclosure 5, Preoperational Test Procedure Completion Schedule, be withheld from public disclosure under 10 CFR 2.390. The redacted versions in Enclosure 2 and Enclosure 4 are suitable for public disclosure.

This letter contains no regulatory commitments.

If you have any questions, please contact Michael Yox at (706) 848-6459.

(Oath and Affirmation are provided on the following page.)

Mr. Mark D. Rauckhorst states that: he is the Executive Vice President of Vogtle 3 & 4 of Southern Nuclear Operating Company; he is authorized to execute this oath on behalf of Southern Nuclear Operating Company; and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Sincerely,

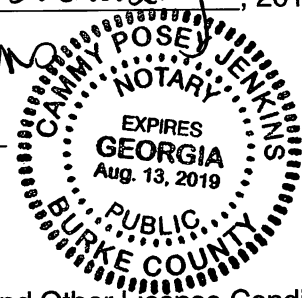
Mark D. Rauckhorst  
Executive Vice President of Vogtle 3 & 4

MDR/DWM/amw

Sworn to and subscribed before me this 25<sup>th</sup> day of January, 2018

Notary Public: Cammy Posey Jenkins

My commission expires: 8/13/19



Enclosures

1. Affidavit for Withholding
2. Redacted COL Operational Programs and Other License Conditions Implementation Schedule
3. Non-Redacted COL Operational Programs and Other License Conditions Implementation Schedule **{Withhold from Public Disclosure}**
4. Redacted Preoperational Test Procedure Completion Schedule
5. Non-Redacted Preoperational Test Procedure Completion Schedule **{Withhold from Public Disclosure}**
6. Confidential Commercial Information Notice

cc:

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosures)  
Mr. M. D. Rauckhorst  
Mr. D. G. Bost (w/o enclosures)  
Mr. M. D. Meier (w/o enclosures)  
Mr. D. H. Jones (w/o enclosures)  
Mr. D. L. McKinney (w/o enclosures)  
Mr. T.W. Yelverton (w/o enclosures)  
Mr. B. H. Whitley  
Mr. C. R. Pierce  
Ms. A. G. Aughtman  
Mr. W. A. Sparkman  
Ms. A. C. Chamberlain  
Mr. O. J. Miller  
Mr. J. D. Williams  
Mr. M. J. Yox  
Ms. A. Pugh  
Ms. K. A. Roberts  
Ms. K. M. Stacy  
Mr. M. K. Washington  
Mr. C. T. Defnall (w/o enclosures 3&5)  
Document Services RTYPE: VND.LI.LOO  
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Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)  
Ms. J. M. Heisserer  
Mr. C. P. Patel  
Mr. M. E. Ernstes  
Mr. G. J. Khouri  
Mr. T. E. Chandler  
Ms. S. E. Temple  
Ms. P. Braxton  
Mr. T. C. Brimfield  
Mr. A. J. Lerch  
Mr. C. J. Even  
Mr. B. J. Davis  
Mr. B. J. Kemker  
Ms. C.D. Taylor  
Mr. T. McGinty

Oglethorpe Power Corporation

Mr. M. W. Price (w/o enclosures 3&5)  
Mr. K. T. Haynes (w/o enclosures 3&5)

Dalton Utilities

Mr. D. Cope (w/o enclosures 3&5)

Westinghouse Electric Company, LLC

Dr. L. Oriani (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Ms. L. G. Iller

Mr. D. Hawkins

Mr. C. F. Landon

Ms. S. DiTommaso

Mr. J. L. Coward

Mr. M. M. Corletti

Other

Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc. (w/o enclosures 3&5)

Mr. S. Roetger, Georgia Public Service Commission (w/o enclosures 3&5)

Ms. S. W. Kernizan, Georgia Public Service Commission (w/o enclosures 3&5)

Mr. K. C. Greene, Troutman Sanders (w/o enclosures 3&5)

Mr. S. Blanton, Balch Bingham

**Southern Nuclear Operating Company**

**ND-18-0034**

**Enclosure 1**

**Affidavit for Withholding**


**Prepared in Accordance with 10 CFR 2.390**

**for Southern Nuclear Operating Company**

**(This Enclosure consists of 3 pages, including this cover page)**

**AFFIDAVIT**

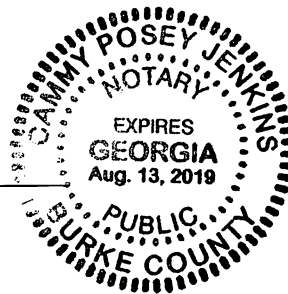
Before me, the undersigned authority, personally appeared Mark D. Rauckhorst who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Southern Nuclear Operating Company, and that the statements of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

  
\_\_\_\_\_

Mark D. Rauckhorst

SWORN to and SUBSCRIBED before me this 25<sup>th</sup> day of January 2018 in Burke County, Georgia

Notary Public: Sammy Posey Jenkins  
My Commission Expires: 8/13/19



**STATES THE AFFIANT:**

1. My name is Mark D. Rauckhorst, and I am over the age of 18. My office is located in Burke County, Georgia. I am employed by Southern Nuclear Operating Company ("SNC") as the Executive Vice President of Vogtle 3&4. I am authorized to make this affidavit on behalf of SNC.

2. I have personal knowledge of the criteria and procedures used by SNC to designate information as trade secrets, privileged or as confidential commercial or financial information.

3. In accordance with 10 C.F.R. 2.390, I am making this Affidavit to support SNC's request for withholding, contained in the letter accompanying this Affidavit. The specific information to be withheld is contained on pages 1 – 6 of Enclosure 3 (COL Operational Programs and Other License Conditions Implementation Schedule) and pages 1 – 9 of Enclosure 5 (Preoperational Test Procedure Completion Schedule).

4. The information is sought to be withheld under 10 C.F.R. 2.390(a)(4), as it is confidential commercial information. In support of this request for withholding and pursuant to 10 C.F.R. 2.390(b)(4), I state the following:

- i. SNC has held the information in confidence.
- ii. This information is of a type customarily held in confidence by SNC.
- iii. This information is being transmitted to the NRC in confidence.
- iv. This information is not available in public sources.
- v. The public disclosure of the information sought to be withheld is likely to cause substantial harm to SNC's competitive position. The information sought to be withheld contains aspects of SNC's development plans, the release of which will likely cause harm by allowing other entities to gain a competitive advantage through prior knowledge of SNC's construction and procurement plans.

FURTHER AFFIANT SAITH NOT.