



June 26, 2026

AEP-ND-NRC-2026-003

Project No.: 99902170

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

Subject: Response Letter to Acknowledgement of Interest in Applicant-Prepared National Environmental Policy Act Document Pilot Project for American Electric Power Company, Inc. Advanced Nuclear Project Two

On June 10, 2026, American Electric Power Company, Inc. (AEP) received correspondence from the United States Nuclear Regulatory Commission (NRC) entitled "ADVANCED NUCLEAR PROJECT TWO, ACKNOWLEDGEMENT OF INTEREST IN APPLICANT-PREPARED NATIONAL ENVIRONMENTAL POLICY ACT DOCUMENT PILOT PROJECT (EPID NUMBER: I-2026-LRM-0059; DOCKET NUMBER: 99902170)" [ML26160A348]. The purpose of this letter is to provide AEP's formal response to the requests outlined in that correspondence.

AEP acknowledges and accepts the responsibilities described in the NRC's letter. Enclosed with this response is documentation prepared by AEP's contracted support organization, including information regarding the contractor's qualifications and experience, as well as its organizational conflict of interest disclosure statement.

This submittal contains no regulatory commitments. Should you have any questions, please contact Mr. Timothy Siefer, Licensing Manager, at (269) 466-2573.

Sincerely,

Signed by:

A handwritten signature in black ink that reads "Q. Shane Lies". The signature is written in a cursive style. It is enclosed in a blue rectangular box that has a rounded top-left corner and a small gap at the bottom-left corner.

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Q. Shane Lies

Executive Vice President, Nuclear Operations

TCS

c: Joe O'Hara – NRC Washington, D.C.
Daniel Barnhurst – NRC Washington, D.C.
Andrea Johnson – NRC Washington, D.C.
Michelle Hayes – NRC Washington, D.C.

Enclosure: Applicant-Hired Contractor (Enercon) Organizational Conflict of Interest (OCI) Representation Statement and List of Qualifications

ENCLOSURE

APPLICANT-HIRED CONTRACTOR (ENERCON)

**Organizational Conflict of Interest (OCI) Representation
Statement and List of Qualifications**



Organizational Conflict of Interest (OCI) Representation Statement

EPID No. L-2026-LRM-0059

Docket Nos. 99902170

In accordance with the NRC Applicant-Prepared NEPA Document Pilot Program participation letter and applicable organizational conflict of interest requirements, Enercon Services, Inc. ("ENERCON") hereby provides the following statement:

As a representative of my organization, I hereby certify that, to the best of my knowledge and belief, no facts exist relevant to any past, present or currently planned interest or activity (financial, contractual, personal, organizational or otherwise) that relate to the proposed work; and bear on whether the organization and any of its affiliates has a possible conflict of interest with respect to (1) being able to render impartial, technically sound, and objective assistance or advice; or (2) being given an unfair competitive advantage.

Signature :  Date : 6/17/26

Name : Jay Basken Title : Engineering Vice President

Organization : ENERCON Services, Inc.

List of Qualifications

Ms. Rachel Turney-Work is the Director of New Reactor & Environmental Licensing and has over 20 years of experience as a Project Manager and Senior Nuclear Licensing Specialist. She is responsible for the oversight of all new nuclear and environmental licensing projects and has supported over 50 license applications (e.g., ESP, CPA, OLA, COLA, LRA, SLRA, and decommissioning) for nuclear power facilities located within the United States and internationally. These projects have supported every phase of a facility's life cycle, including site selection, early site permitting, construction permit applications, operating licensing applications, combined operating licensing applications, LRs, SLRs, and decommissioning. Ms. Turney-Work has completed ten new nuclear facility site selections, ten site feasibility studies and supported two early site permitting applications, including the Clinch River ESP. For each of these projects, she supported the development of technical content, completed peer/management reviews, reviewed content for regulatory compliance, assisted with industry peer reviews, and supported regulatory reviews, site audits and RAI/RCI response development. For the Holtec CPA Project, Rachel supported development of the licensing strategy for the LWA, consolidated ER, which includes both LWA and CPA impact evaluations, and the SAR. She also supported the site characterization activities and actively supports all pre-application NRC engagement activities, management reviews of technical content, agency consultation and engagement and permitting activities.

Mr. Dane Watson, PMP, is a Senior Engineering Manager and has over 19 years of experience. Mr. Watson manages multiple nuclear and environmental projects across the United States and Canada, to include new reactor licensing, renewal, and decommissioning projects. Mr. Watson has managed technical studies for a recent CPA submittal and has coordinated multiple geotechnical site investigations. He manages a diverse staff of engineers and technicians that provide support to clients at any stage of licensing, from new reactor siting to decommissioning. Mr. Watson manages a cost estimating team, an ENERCON group which provides services to all sectors of the nuclear industry from initial licensing through the generation of a license termination plan. Mr. Watson also manages ENERCON's radiological service team, which can provide support to clients with various services and positions such as instrument technician, radiological waste shipping, or Radiation Safety Officers.

Mr. Tim Basham is a Senior Manager of Environmental Licensing with more than 25 years of experience. He previously served as a Senior Project Manager in ENERCON's Environmental Licensing group, where he manages multidisciplinary work for various nuclear projects in the western U.S. and performs Site Lead duties for ENERCON's Columbia Generation Station support. Mr. Basham has performed and led work in the nuclear industry since 2002 when he led the development of the ER in support of the ESPA for Grand Gulf Nuclear Station's proposed new nuclear plant. This included overseeing environmental site characterization activities under NUREG-1555 including agency consultations, field investigations, and subcontracted activities. Mr. Basham then took program-level responsibility for ENERCON's environmental support of new nuclear plant COLAs at numerous plants, including Lee, Comanche Peak and Bellefonte.

Since that time, Mr. Basham has managed significant budgets on complex nuclear projects for both new and existing power plants ranging from site selection studies to LRAs and a wide variety of interdisciplinary engineering projects. In 2018, Mr. Basham accepted an assignment leading ENERCON's international operations in the United Arab Emirates, where the Barakah Nuclear Energy Plant site was being developed. He continues to perform project management duties for ENERCON's international nuclear clients, including for new technology development as the industry rapidly evolves with Advanced Reactor designs and SMRs.

Mr. Conrad Newell has over 12 years of experience in federal environmental regulations and statutes. He serves as ENERCON's Principal Technical Specialist for environmental licensing within the Nuclear Services Group. In this position he assists clients in navigating the complex federal, state, and local regulatory ecosystem. He assists ENERCON in the development of stakeholder engagement policies and strategies for nuclear facilities being constructed and acquiring new licenses. He is also the principal overseeing implementation and development of preparatory documents for federal and state regulations including NEPA, Clean Water Act and the Endangered Species Act. Mr. Newell has extensive experience in permitting and authorizing highly complex commercial and military operations, including authorizing the region wide navy construction and operations plan for NAVFAC-NW, the construction and operations authorizations of more than a dozen offshore wind farms, and the construction of oil spill response terminals.

Mr. Fred Woodridge is the GIS National Lead at ENERCON's Oklahoma City, OK office and has over 17 years of experience in the application of GIS techniques and geospatial analysis. As the GIS National Lead, he coordinates GIS projects

and staffing activities, standardizes ENERCON's data management and mapping processes, and oversees the quality control and transmittal of GIS deliverables. Mr. Woolridge also serves as the GIS Lead of ENERCON's Slate service, providing oversight of custom web application development and data integration into client GIS systems. He has led the development of custom web applications for the Environmental Inspection, NEPA, and Power Delivery groups. As a Sr. Analyst, Mr. Woolridge has built an expertise in the development of environmental site characteristic inputs, and as part of the Environmental Licensing team, he has served as the GIS SME for several Small Modular Reactor siting projects, as well as the GIS Lead and SME for LRA and SLRA ER projects.

Ms. Caitlin Current, P.G., is ENERCON's go-to hydrogeologist with over 20 years of experience in hydrogeologic expertise. She is the principal groundwater modeler providing visualization and strategy assuring successful execution on ENERCON's nuclear projects. Mrs. Current has extensive experience fostering and creating good faith relationships between client teams and regulatory agencies resulting in regulatory-approved solutions for complex environmental issues. She has been a key member of project teams that successfully managed small and large projects including hydrogeological characterization, conceptual site model development, NPL sites, RCRA facilities, CCR management facilities, nuclear new construction and development projects, and nuclear subsequent license renewals.

Mr. Jay Hemmis is an Ecologist with over 13 years of experience in the environmental sciences. He is responsible for performing environmental analyses for developing technical content for ecological reports and for supporting license renewal applications for the Nuclear Regulatory Commission. Mr. Hemmis has extensive experience in ecology, wetlands science, and GIS for projects in both private and public sectors ranging from small-scale construction and mitigation efforts to large-scale, multi-million-dollar transportation and mining operations.

Mr. Rajit Patankar, PhD., is a Senior Ecologist with over 23 years of research experience, including field research, in terrestrial and aquatic ecosystems in North America. Additionally, he has over 13 years of leadership and management experience, including overseeing projects, supporting operations, and building interdisciplinary teams. He has extensive technical communication skills and expertise in several data management, GIS, and visualization software. He has engaged in biological research with several universities, including The University of Toronto and the University of Alabama, and has published extensively within the field of ecology. Outside of the university setting, Dr. Patankar has experience

managing large operations budgets for the National Ecological Observatory Network, as well as researching and working with imaging and GIS software with the NOAA.

Dr. Ricky Summitt, PE is the Principal PRA Engineer for ENERCON and has more than 40 years of experience in risk analysis, including deterministic and probabilistic techniques, to manage and perform technical tasks assessing safety and reliability concerns for nuclear and chemical projects, both domestically and internationally. He is also experienced in developing physical security assessment and training applications. He also develops and applies off-site consequence models using MACCS and ALOHA. He is a registered professional engineer in the states of North Carolina, South Carolina, and Tennessee. He is a member of the American Nuclear Society (ANS) and the American Society of Mechanical Engineers (ASME). Mr. Summitt has led and conducted over 50 internal and external events, PRAs, and performed numerous risk-informed applications and related studies. He was involved in the Industry Degraded Core Rulemaking (IDCOR) Program, supporting the development of severe accident phenomena, MAAP analyses, and MELCOR. He has also been involved in multiple PRA peer review activities covering model development, level 2 analysis, and external events.

Mr. Jonathan Subacz, MBA, is an Environmental Licensing Engineer for ENERCON's Environmental Licensing Group. He has over 21 years of combined experience in consulting and environmental engineering, Mr. Subacz is a high-performing environmental engineering professional with 21 years of comprehensive experience and more than 12 years of experience in environmental licensing, regulatory compliance, project management, and operations management. He has a diverse educational background and work experience in environmental compliance, environmental management systems (EMS), and environmental licensing applications. Mr. Subacz has experience preparing combined operating license application (COLA) final safety analysis report (FSAR) and environmental report (ER) for two new nuclear power plant projects in North Carolina and Florida. He has managed the technical delivery of regulatory compliance projects including 316(b) compliance, NPDES and Title V permit applications, stormwater pollution prevention plans (SWPPP), spill control and countermeasures (SPCC) plans, and facility response plans (FRP). Mr. Subacz strengths include project management, technical writing, and verbal communication/training skills.

Ms. Mary Hoganson is a Senior Environmental Scientist with more than 33 years of experience in environmental assessment reviews and regulatory compliance for various utility clients and other business sectors. Ms. Hoganson has served in analyst and leadership positions in preparing numerous environmental studies for the U.S. Department of Energy, Department of Defense, Nuclear Regulatory Commission, federal and state, and various industrial and private sector clients, including 18 NEPA documents and more than 20 Environmental Reports for power plant licensure and energy infrastructure. She is experienced in collecting and assimilating baseline biological and existing environmental conditions for NEPA assessments, especially in the areas of ecological resources, water quality, health impacts, and waste management as well as screening and analyzing energy alternatives for proposed electrical plants.

Ms. Hoganson has also prepared materials to inform the public of various projects and on various environmental topics including public meeting handouts, posters, and letters to the public. Ms. Hoganson has served in various leadership roles. In her leadership roles, Ms. Hoganson has developed the technical approach for the analysis, identified data sources and gaps, reviewed other analysts work, met with clients' review teams, and participated in meetings and audits with federal and state regulators. Ms. Hoganson served as project manager (PM) for five ERs to support Post-Shutdown Decommissioning Activity Reports, Deputy PM on the ER for the new AP1000 units at Vogtle Electric Generating Plant, and technical lead for DOE's proposed Advanced Fuel Cycle Facility volume of the Global Nuclear Energy Partnership Programmatic Environmental Impact Statement. Ms. Hoganson also served as the NEPA expert on the owner's review team for the Environmental Impact Assessment prepared for first nuclear power plant in the United Arab Emirates.

Ms. Emily Keenan is an Environmental Scientist with 9 years of experience in environmental consulting and environmental science. She is responsible for researching and determining feasibility of alternative energy sources for license renewal reports submitted to the NRC. Ms. Keenan has extensive experience in environmental technical writing, field surveys, and soil, water and vapor sampling. Ms. Keenan has developed technical content for several nuclear licensing applications, including two LRA ERs and three SLRA ERs.

Mr. Jerry Riggs is a Principal Environmental Licensing Specialist and SME for Special Projects who has supported numerous energy and infrastructure projects. He has over 18 years of experience. He has supported 20 license applications

(e.g., COLAs, LRAs, SLRAs, and decommissioning efforts) for nuclear power facilities located within the U.S. and internationally. Mr. Riggs has assisted with nine new nuclear facility site selections, nine site feasibility studies, and two ESP applications, including the TVA Clinch River ESP. He was the SME for sections in five COLAs, including the William States Lee COL, Bellefonte Units 3 and 4 COL, and the Barakah Nuclear Energy Plant (UAE) license applications. He was the SME for sections in 11 LRAs for nuclear facilities, including the TVA Sequoyah LRA. Additionally, Mr. Riggs was the SME for sections in nine SLRA ERs, including Surry Power Station Units 1 and 2, North Anna Power Station Units 1 and 2, Oconee Nuclear Station Units 1, 2, and 3, and Point Beach Nuclear Plant Units 1 and 2. Additionally, he has participated as an expert witness on population, population projections, transient populations, and environmental justice populations at the Indian Point Atomic Safety and Licensing Board.

Mr. Micah Bennett, PhD, is a Principal Ecologist within ENERCON's Nuclear Services Group with over 20 years of experience in biological and environmental sciences, and more than two dozen peer-reviewed publications. Here he works on reviewing and developing technical content for environmental reports, proposals, and other products supporting nuclear licensing/re-licensing projects. His work at ENERCON includes: supporting environmental permitting and water quality modeling for Holtec Palisades Pioneer Units 1 and 2; water availability and regulatory evaluations for multiple nuclear site evaluations; as well as environmental technical work for Early Site Permit and Combined Operating License Applications for multiple sites. Prior to his time with ENERCON, Dr. Bennett worked at the U.S. Environmental Protection Agency in research and policy implementation related to the Clean Water Act, building collaborative, interdisciplinary teams and projects to address critical needs in water quality.

Ms. Kayla Ferguson is an Environmental Scientist. She has over 4 years of professional experience conducting ecological assessments, field investigations, and environmental monitoring and reporting in support of regulatory compliance. Proven ability to independently plan and execute fieldwork, analyze ecological data, and produce high-quality technical reports. Collaborative team member attuned to working alongside project managers, engineers, clients, and regulatory agencies to deliver projects on time and within budget. Detail-oriented scientist with problem-solving, documentation, and communication skills, capable of balancing field demands with analytical and reporting responsibilities.

Mr. Drew Hooper is as an Associate Hydrogeologist for the Nuclear Services

Group division at ENERCON. He has experience in conducting groundwater investigations; analyzing the geochemical properties of rocks and minerals; writing technical reports; and presenting findings at conferences. Mr. Hooper has experience in researching the fate of Rare Earth Element resources in Coastal Plain sedimentary rocks, which has prepared him to evaluate the fate of heavy metals and radionuclides in groundwater systems. Has worked well as a team member, mentor, and independent researcher to meet versatile project demands. Mr. Hooper earned a Master of Science degree in Geosciences.

Division of Responsibilities

ENERCON will be the primary contractor for the project. ENERCON is partnering with several companies (subcontractors) that specialize in areas necessary for EIS development. The division of responsibility (DOR) between ENERCON and our partners is summarized below. Unless otherwise discussed below, ENERCON will be responsible for the remaining project activities

SEARCH will be responsible for conducting the Phase 1a Cultural Resource Survey and preparation of the field report documenting their observations and findings.

Normandeau Associates will be responsible for conducting aquatic studies in support of habitat assessment, water quality monitoring, fish community sampling, benthic macroinvertebrate surveys, and freshwater mussel characterization.

List of Subcontractors

The following organizations have joined with ENERCON to execute this project for AEP:

SEARCH



SEARCH

Southeastern Archaeological Research, LLC. (SEARCH) is founded on the principles of sound

research and quality service. SEARCH has continuously expanded its personnel, services, and geographic reach.

SEARCH deploys the full spectrum of cultural heritage services worldwide and SEARCH2O, its maritime program, is at the forefront of historic shipwreck and submerged pre-contact archaeology, paleolandscape reconstruction, and deep-water archaeology. SEARCH's staff are cultural resource industry leaders, pioneers, and subject matter experts across 45 Market, Regional, and Research

Sectors. Since 1993, SEARCH has completed more than 5,000 commercial and government projects in 48 U.S. states, 6 U.S. territories, and 39 countries spanning 7 continents and 4 oceans. By integrating science, technology, and creativity, SEARCH harnesses the power of the past to advance the projects, places, and people it serves.

Normandeau Associates



Normandeau is a national leader in providing science-based environmental consulting services, research, and technological innovation across a biological spectrum. Founded in 1970, it is recognized for broad experience, scientific excellence, and quality client service. From the lab to the field, Normandeau's scientists have over 40 years of experience, and have varied certifications and degrees to work in diverse environments, markets, and with state-of-the-art technologies. Normandeau provides fisheries scientists; bat, bird & wildlife biologists; qualified mussel surveyors; wetland scientists; scientific diving; permitting and National Environmental Policy Act (NEPA) specialists; and data analysts; and biological lab technicians. Normandeau is well known for its ability to undertake complex field programs and to mobilize personnel, team members, and necessary equipment to complete projects on time and on budget. Its field teams can mobilize quickly and appropriately sized for the scope of a project. Teams are supervised by field operation supervisors with decades of experience collecting samples from terrestrial, aquatic, and marine environments. Normandeau designs collection programs and performs sampling to exacting standards based on both regulatory and client needs.

Normandeau maintains an extensive fleet of vessels, vehicles, and other equipment necessary to the successful implementation of monitoring programs. This inventory includes 37-foot trawlers, 42-foot diesel research vessels, 25-foot high-speed research vessels, a coring barge, numerous workboats ranging in size from 18 to 22 feet, and specially equipped electrofishing boats. Their inventory of field sampling gear includes numerous types of fish nets and traps (e.g., gill nets, fyke nets, otter trawls, and seines), backpack electrofishing units, benthos samplers, several types of current meters, YSI water quality testing instruments, sediment grab samplers, gravity corer, vibracorer, and global positioning systems (GPS). Normandeau operates three of the largest biological laboratories in the northeast, with several personnel who hold taxonomic certification by the Society for Freshwater Science for eastern Ephemeroptera, Plecoptera, and



Trichoptera (Group 2) at the genus level. Its labs specialize in the analysis of freshwater, estuarine, and marine macroinvertebrates; plankton; and ichthyoplankton samples.

Certificate Of Completion

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Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
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Envelope Updated	Security Checked	6/26/2026 12:12:59 AM
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Certified Delivered	Security Checked	6/26/2026 7:07:35 AM
Signing Complete	Security Checked	6/26/2026 7:08:41 AM
Completed	Security Checked	6/26/2026 7:08:41 AM
Payment Events	Status	Timestamps
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ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

Each party agrees that the electronic signatures, whether digital or encrypted, of the parties included in this Agreement are intended to authenticate this writing and to have the same force and effect as manual signatures. Electronic signature means any electronic sound, symbol or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record.

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