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Georgia Board of Professional Engineers & Land Surveyors

Mr. William Womack, PE, Board Chair (Electrical)
Womack & Associates
2300 Lake Park Drive, Suite 250
Smyrna, GA 30080

Mr. Darryl Meckler, Executive Director
237 Coliseum Drive
Macon, Georgia 31217

RE: Southern Nuclear Company, Lapsed Engineering License PEF003372 and Southern Company Engineering and Generation Services, Lapsed Engineering License Number PEF003472.

VIA U.S.P.S. MAIL AND ELECTRONIC MAIL

February 14, 2018

Dear Board Members:

This message is in response to a letter from your office dated February 13, 2018,¹ in which you reply that the matter of Southern Nuclear Company, responsible for construction and engineering at Plant Vogtle Units 3 and 4 while retaining a lapsed engineering license (License Number PEF003372; re-attached here as Ex. "C") and Southern Company Engineering and Generation Services also retaining a lapsed engineering licenses (License Number PEF003472; re-attached here as Ex. "D") "seems to fall outside the scope of the Board's regulatory authority, under O.C.G.A. §43-15-29(d)."²

Twenty-eight chapters of Georgia law empower this Board to protect the public from unlicensed engineering activities, including, in full, this clause:

¹ Georgia State Board of Registration for Professional Engineers and Land Surveyors, February 13, 2017, attached here as "Ex. L."

² *Id.*

(T)he board shall have the power (t)o adopt and enforce regulations implementing this chapter, including regulations governing the professional conduct of those individuals registered by it; (and) to investigate conduct subject to regulation by the board; the chairman or the member of the board who is his or her delegate may administer oaths to witnesses appearing before the board; and the board may secure the enforcement of its subpoenas in the manner provided by Chapter 13 of Title 50, the "Georgia Administrative Procedure Act."

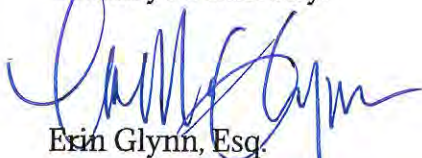
O.C.G.A. §43-15-6(a)(1) and (2)

Yet, your office, presumably under advice from Georgia Power/Southern Nuclear Company, selects to hide behind an antepenultimate exceptions clause, when in reality, that clause does not apply, because, as you are aware, the Vogtle project is sponsored, in majority, by non-PSC regulated entities, who are now in receipt of this correspondence.

The fact remains that the engineering license for Southern Nuclear Company, in charge of construction and engineering activities at Vogtle 3 and 4, has been expired for seventeen and one-half years, and continues to show a lapsed status. (See Exhibit C, attached). Please investigate this matter.

We look forward to receiving a substantive response from this Board by the date of its next meeting, March 7th, 2018, and request again, that you kindly direct all communication on this matter to our office via the contact information below.

Thank you sincerely.



Erin Glynn, Esq.
eglynn@callins.com

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Harmon, Curran, Spielberg + Eisenberg LLP
Attn: Attorney Diane Curren
1725 DeSales Street NW, Suite 500
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CC:

National Society of Professional Engineers
Attn: Mr. Tom C. Roberts, P.E., F.NSPE
1420 King Street
Alexandria, VA 22314-2794

CC:

Nuclear Regulatory Commission
Attn: Kristine L. Svinicki, Chair
11555 Rockville Pike
Rockville, MD 20852

CC:

Mr. Tom Bundros, Dalton Utilities
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PO Box 869
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2100 East Exchange Place
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Mr. Paul McElroy
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Mr. James Fuller, MEAG
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List of Exhibits

- A. Original request for investigation of Southern Nuclear Company/Georgia Power Company, submitted by Nuclear Watch South, December 12, 2017
- B. Southern Nuclear expired license, December 2017
- C. Southern Nuclear expired license, February 2018
- D. Southern Company - Engineering and Generation Services, expired license, February 2018
- E. Georgia Power Company Response Letter, January 9, 2018
- F. "Georgia Power Signs New Contractor for Vogtle Expansion," Power Engineering. July 31, 2017.
- G. "The Case for Paradigm Shift: An assessment of project delivery risk against the backdrop of industry practice," by M.J. Eveses, PE, August 2011.
- H. Westinghouse Memo, 2012
- I. "Stamped for Failure," by Andrew Brown, Charleston Post and Courier. September 24, 2017.
- J. National Society of Professional Engineers (NSPE) Letter, October 26, 2017
- K. Georgia Professional License 'Board Matters' Newsletter, December 2017
- L. Georgia Board of Professional Engineers and Land Surveyors, February 13, 2018

Certificate of Delivery

I hereby certify that I have delivered via U.S. Mail, certified U.S. Mail, and e-mail where available, a copy of the foregoing Letter in Support of Request for Investigation and Supporting Documentation to the following parties:

Troutman Sanders, LLP
Attn: Attorney Jason D. McLarry
Counsel for Georgia Power Company
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Atlanta, GA 30308-2216

Nuclear Watch South, Inc.
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