



Department of Energy

Washington, DC 20585

September 1, 2026

Christopher Nunn
State Historic Preservation Officer and Commissioner
60 Executive Park South, NE
Atlanta, GA 30329

cc:

Jennifer Flood, Division Director
Deputy State Historic Preservation Officer
Georgia Department of Community Affairs
Attn: Environmental Review, Historic Preservation Division
60 Executive Park South, NE
Atlanta, Georgia 30329

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Georgia Power Company, Alvin W. Vogtle Electric Generating Plant Units 1 and 2 Extended Power Uprate Project, Burke County, Georgia

Dear Mr. Nunn,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has executed a Federal loan guarantee agreement with Georgia Power Company (GPC or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to GPC is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. GPC has identified the Alvin W. Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Extended Power Uprate Project (the Project), located in Burke County, Georgia, for potential inclusion in the loan guarantee.

The purpose of this letter is to formally initiate consultation with the Georgia State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents descriptions of the undertaking, the Area of Potential Effects (APE), and the efforts to identify historic properties, and seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

A Georgia Historic Preservation Division (HPD) Environmental Review Form is included as Attachment 1.

Description of the Undertaking

DOE's proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project). Nuclear power plants are licensed to perform within a maximum power level. A power uprate is a process used to increase the maximum power level at which a nuclear power plant can operate. This involves making changes to the plant's equipment, systems, and operational procedures to allow it to produce more electricity without compromising safety. Nuclear power uprates are subject to regulatory approval, and extensive analysis and testing are required to ensure that the plant can operate safely at a higher power level. GPC plans to implement an Extended Power Uprate (EPU), will involve modifications to existing plant equipment, systems, and operational procedures to support operation at the proposed increased power level. Planned Project modifications include upgrades to 10 balance-of-plant systems and components:

1. Circulating Water Upgrades (e.g., upgraded pumps/motors)
2. EX2100e Upgrades
3. Generator Step-Up Transformer Cooling (potential transformer replacements)
4. Heater Drain Pump Motors
5. High Pressure Turbine Rotor
6. Main Feed Pump & Turbine
7. Main Generator Brush Holders
8. Main Generator Grounding & Protective Relays
9. Moisture Separate Reheaters
10. Turbine Plant Cooling Water Heater Exchanger

The proposed EPU is not expected to expand the existing developed footprint of the facility or require new land disturbance. All equipment replacements and modifications will occur within existing plant structures and previously developed areas. No ground disturbance or excavation is planned, and the EPU will not require construction of new laydown areas, access roads, or other new facilities.

The EPU is subject to approval by the U.S. Nuclear Regulatory Commission (NRC). GPC plans to submit a License Amendment Request (LAR) to the NRC in the fourth quarter of 2028 requesting authorization to increase the licensed electrical generating capacity of Units 1 and 2 from approximately 2,430 MW(e) to 2,536 MW(e).

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The Project's APE includes the area where Project activities will occur within the existing VEGP facility. The proposed Project activities include replacements and upgrades to

existing facility components, which warrants an evaluation of VEGP's potential eligibility for inclusion on the National Register of Historic Places (NRHP).

As no new ground disturbance is required for the Project, potential effects on archaeological resources are not expected to occur, and archaeological survey is not warranted. As the Project does not include any proposed new permanent above-ground construction that would alter the exterior of the VEGP facility in a manner that could affect the character of the surrounding setting, visual and other non-physical effects on historic properties external to the VEGP facility are not expected to occur, and historic architectural survey external to the VEGP facility is not warranted.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following eleven (11) federally recognized Tribes to see if they have an interest in the Project: Alabama-Quassarte Tribal Town; Catawba Indian Nation; Coushatta Tribe of Louisiana; Kialegee Tribal Town; Miccosukee Tribe of Indians; Muscogee (Creek) Nation; Poarch Band of Creek Indians; Seminole Tribe of Florida; Seminole Nation of Oklahoma; Thlopthlocco Tribal Town; and United Keetoowah Band of Cherokee Indians in Oklahoma.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or necessary.

Historic Architectural Resources

DOE previously consulted SHPO regarding the NRHP eligibility of VEGP for a separate Federal financing action related to equipment and digital modernization within the VEGP facility (**HPD Project Number:** HP-250902-005). As part of the Section 106 identification process for that consultation, qualified historians at Edwards-Pittman, Inc. (EP) prepared an Architectural Survey Report of VEGP that is summarized below and included again here as Attachment 2. In a letter dated September 2, 2025, DOE determined that the surveyed VEGP historic architectural resources were not eligible for inclusion on the NRHP, and SHPO concurred that no historic properties were affected in a letter dated October 2, 2025.

Through background research, EP historians found that no previous architectural surveys had been conducted and no previously recorded architectural resources were present on the VEGP property prior to their study (Attachment 2). The architectural assessment reviewed historic aerial photographs to determine if there are any buildings or structures over 45 years of age on the VEGP property.

Based on historic aerials from 1969/1970, before the construction of VEGP the area was primarily wooded with cleared agricultural fields present in the central portion of what is now the VEGP; potential residences and agricultural outbuildings are present at this time. In the 1981 aerial, the VEGP area had been laid out and construction on the nuclear power plant buildings and structures had begun and the buildings visible in the 1969/1970 aerial no longer appear to be present. Two new buildings are visible in the 1981 aerial; these have both since been demolished and were likely temporary structures used during construction. In addition, the 1981 aerial shows that foundations for buildings associated with VEGP Units 1 and 2 had been laid, though the buildings were not yet complete.

Near the east side of the property is a series of buildings that appear to be fully constructed at the time of the 1981 aerial photograph. This area is Plant Wilson, a combustion engine plant and substation with fuel oil storage tanks that serves as one of VEGP's sources of off-site power as required for nuclear safety and three fuel oil storage tanks. Based on aerial imagery and information available from Georgia Power, Plant Wilson was constructed between 1970 and 1979 and was likely one of the power sources used during VEGP's initial construction. Plant Wilson is the only area of the VEGP property that contains historic resources over 45 years of age; however, the components of Plant Wilson are not individually significant and therefore are not eligible for the NRHP.

None of the activities proposed as part of the Project involve work at Plant Wilson, which is the only aboveground historic resource on the VEGP property that meets the age threshold to be considered for NRHP eligibility. The Project does not include alterations to any buildings over 50 years of age which are eligible for, or listed in, the NRHP. The Project does not include any activities that would alter the exterior of the VEGP facility in a manner that could affect the character of the surrounding setting, and therefore there is no potential for the Project to cause visual or other non-physical effects on historic properties external to the VEGP facility. As no ground disturbance is proposed, there is no potential for the Project to affect archaeological resources which may be eligible for the NRHP. Therefore, no historic properties would be affected by the Project.

Requesting your Concurrence and Next Steps

Based on DOE EDF's review of the efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Georgia SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter.**

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me at 202-913-3477 or via email at EDF_Environmental@doe.gov.

Sincerely,

Don Brown
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Georgia SHPO Project Review and Consultation Form
Attachment 2. Historic Architecture Assessment