DIRECT TESTIMONY OF  
stephen E. kuczynski and John B. Williams

IN SUPPORT OF GEORGIA POWER COMPANY’S

Twenty-Sixth SEMI-ANNUAL VOGTLE CONSTRUCTION MONITORING REPORT

DOCKET NO. 29849

1. INTRODUCTION

Q. PLEASE STATE YOUR NAMEs, TITLEs, AND BUSINESS ADDRESSes.

**A.** My name is Stephen E. Kuczynski. I am the Chairman, President, and Chief Executive Officer of Southern Nuclear Operating Company (“Southern Nuclear” or “SNC”). My business address is 7825 River Road, Waynesboro, Georgia 30830.

My name is John B. Williams. I am the Vice President of Business Operations for Plant Vogtle Units 3 and 4 (the “Project”). My business address is 7825 River Road, Waynesboro, Georgia 30830.

Q. Mr. Kuczynski, please summarize your education and professional experience.

**A.** I graduated from the Milwaukee School of Engineering with a Bachelor of Science degree in electrical engineering technology. I am also a graduate of the Harvard Advanced Management Program and have earned a senior reactor operator license from the U.S. Nuclear Regulatory Commission (“NRC”). I was elected to my current position as Chairman, President, and Chief Executive Officer of Southern Nuclear in July 2011. I am responsible for construction of the Plant Vogtle Units 3 and 4 (the “Project”) and other nuclear development initiatives, as well as all operations at Southern Company’s six operating nuclear reactors at plants Farley, Hatch, and Vogtle. I have more than 37 years of experience in the nuclear industry, joining Southern Nuclear from Exelon Nuclear, where I held the role of Senior Vice President of Engineering and Technical Services, responsible for fleet engineering, capital projects, outage services, and nuclear fuel. Prior to that role, I was the Senior Vice President of Exelon Nuclear’s Midwest Operations. In that role, I was responsible for oversight of Exelon Nuclear’s six Illinois operating facilities and 11 reactors.

I previously served as chair of the Nuclear Energy Institute’s (“NEI”) Advanced Reactor Working Group and the New Plant Advisory Committee. I am a former member of the Terrestrial Power Industry Advisory Board and the board of advisors of X-Energy, a nuclear reactor and fuel design engineering services company. I previously served on the board of directors and the executive committee of NEI, the Institute of Nuclear Power Operations National Nuclear Accrediting Board, as well as the advisory boards for the Oak Ridge National Laboratory Nuclear Science and Engineering Directorate, and the U.S. Department of Energy’s (“DOE”) Gateway for Accelerated Innovation in Nuclear. I previously served as a member of the DOE’s Office of Nuclear Energy, Nuclear Energy Advisory Committee. I have received the Special Achievement Award from the U.S. Nuclear Infrastructure Council and the Presidential Citation from the American Nuclear Society. I testified before Congress about advanced nuclear technology innovation on May 17, 2016.

Q. Mr. Kuczynski, have you previously testified before the GEORGIA PUBLIC SERVICE commission (“COMMISSION”)?

**A.** Yes. I testified in this docket regarding the Eighteenth, Nineteenth, Twentieth/Twenty-first, Twenty-second, Twenty-third, Twenty-fourth, and Twenty-fifth Semi-annual Reports.

Q. Mr. Williams, please summarize your education and professional experience.

A. I graduated from the Georgia Institute of Technology with a bachelor’s degree in nuclear and radiological engineering. I am currently the Vice President of Business Operations for Southern Nuclear Plant Vogtle 3&4. I joined Southern Nuclear in 2005 and have more than 20 years of engineering and nuclear fuel experience and have served in several leadership positions throughout the Southern Nuclear organization, including Plant Hatch Engineering Director, Nuclear Fuels and Analysis Director, and Interim Engineering Vice President.

I have represented Southern Nuclear on the Department of Energy Industry Advisory Boards for the Advance Fuels Campaign and the Nuclear Energy Advance Modeling and Simulation (“NEAMS”) program. I have also served as the utility lead for the Nuclear Energy Institutes’ Accident Tolerant Fuel Working Group’s (“ATFWG”) Licensing and Safety Benefits Task Force, leading the team that introduced the first Accident Tolerant Fuel into a commercial reactor at Plant Hatch in 2018 and Plant Vogtle in 2019.

Q. Mr. Williams, have you previously testified before the commission?

**A.** No.

Q. What is the purpose of your testimony?

**A.** The purpose of our testimony is to support the Twenty-sixth Semi-annual Vogtle Construction Monitoring (“VCM”) Report and to update the Commission on efforts by Southern Nuclear regarding the construction and future operation of this long-term asset for Georgia customers. Additionally, our testimony, along with the testimony of Georgia Power Company’s (“Georgia Power” or the “Company”) witnesses Mr. McKinney and Mr. Haswell, provides justification for Georgia Power’s actual expenditures invested in the Project between July 1, 2021, and December 31, 2021 (the “Reporting Period”), as made pursuant to the Certificate of Public Convenience and Necessity.

1. PROJECT STATUS

Q. what is the current status of the Project?

**A.** As discussed in the VCM 26 Report, the Project team continues its work promoting a safety-first culture. The Project continued on a positive safety trend that is well below the heavy construction industry average with a Total Recordable Incident Rate for 2021 at the lowest level since 2015. Site leadership continues to emphasize the importance of safety onsite.

We remain committed to our organization’s high standards for safety and quality and continue to prioritize these two tenets ahead of schedule. The next major milestone for Unit 3 will be the receipt of the historic 103(g) letter from the NRC. The NRC’s 103(g) letter will document the NRC’s finding that there is reasonable assurance the Unit 3 license acceptance criteria are met, meaning that Unit 3 has been constructed and will be operated in conformance with the license, the Atomic Energy Act, and NRC regulations. Upon receipt of the 103(g) letter from the NRC, Inspections, Tests, Analyses and Acceptance Criteria (“ITAAC”) are no longer part of Unit 3’s license and no further NRC issuances are necessary in order for SNC to load fuel or begin the startup sequence.

Additionally, Site Operations continues to prepare for Unit 3 Fuel Load and Startup Testing. After fuel is loaded in Unit 3, Startup Testing will demonstrate the integrated operation of the primary coolant system and secondary systems at design temperature and pressure using nuclear fuel inside the reactor prior to reaching commercial operation.

For Unit 4, the Project successfully completed the Structural Integrity (“SIT”) and Integrated Leak Rate (“ILRT”) tests. The successfully completed tests not only demonstrated that the Containment Vessel meets the design requirements for protection of the plant and the public during normal and emergency operating conditions; but also the ability of the Project team to reduce the testing duration through the incorporation of lessons learned from Unit 3.

The Project has turned over systems critical to the completion of the Integrated Flushing (“IF”) evolution and to support Open Vessel Testing (“OVT”). Each of these milestones is significant to the progress of Unit 4 as it continues its transition from a heavy construction focus to testing. In the coming months, Unit 4 will progress further into testing as the Project team completes OVT and transitions to Closed Vessel testing, both of which support Cold Hydro testing projected to occur later in 2022.

**Q. What is the percent complete for the Project?**

**A**. We provide the Total Project Percent Complete as of January 31, 2022, on page 14 of the VCM 26 Report. The Total Project Percent Complete shown below is one measure of how progress is tracked onsite and does not include work associated with remediation. As of March 31, 2022, those figures are:

|  |  |
| --- | --- |
| Table 1 – Project Percent Complete | |
| **Project Phase** | **% Complete** |
| Engineering | 100% |
| Procurement | 99.9% |
| Construction | 97.1% |
| I&C/Cyber Security | 99.9% |
| ITP/Startup Testing | 69.3% |
| **Total Project** | **96.3%** |

q. DID the nrc complete its follow-up inspection?

**A.** Yes. The NRC completed its follow-up inspection at Unit 3, which verified that the corrective actions taken by Southern Nuclear to resolve findings associated with the Corrective Action Program and electrical commodity installation issues were effective. The NRC concluded that no findings were identified from the follow-up inspection. As a result of the inspection, the NRC Staff reported during the exit interview that the criteria of the Inspection Procedure 90001, “Construction Regulatory Response Column Inspections,” were satisfied. While the associated NRC inspection report is not anticipated until May 2022, the NRC has closed the two white findings identified by the NRC in November of 2021 and returned Vogtle Unit 3 to the baseline inspection program.

Q. Can you briefly describe the actions taken by southern nuclear in response to the NRC’s findings which resulted in closure of the open findings?

A. Southern Nuclear Management identified the IEEE-384 cable separation concerns in late 2020 and initiated an Extent of Condition (“EOC”) investigation. As previously discussed in the VCM 24 and VCM 25 proceedings, in January 2021, the EOC effort was included in a Root Cause Determination (“RCD”) following additional discovery. The Project Team worked diligently to identify the extent of the issues and the details that precipitated the challenges.

During the execution of the RCD, and as the contributing causes were identified, the Management team immediately took actions to curtail the issues through expanded electrical training, increased oversight, heightened focus on the Corrective Action program, and leadership changes in the Quality Control organization.

The issues identified during the review were documented through the Corrective Action Program in Condition Reports, then a remediation plan was established that included joint walkdown evaluations and increased inspections. Additionally, the Project team engaged the Engineering organization to evaluate the issues and identify actions to ensure that the standards were achieved, and the resolutions remained consistent with the unwavering quality expectations of Southern Nuclear for delivering a plant which will operate safely for the next 60 to 80 years.

Project leadership extended the evaluation to Unit 4 to ensure any issues with Unit 4 were identified, remediated, and that process improvements were implemented to minimize impacts to Unit 4.

Based on the results of the March 2022 NRC inspection, which noted no findings along with an elevated and improved pace of Corrective Action utilization, it is clear the actions taken by the Project team over the past year have resolved the findings through a demonstrated focus and commitment to improving upon the areas of concern and ensuring that a quality asset will be placed in service.

1. Status of Project Schedule

Q. what is the current projected in-service date for unit 3?

a. The in-service dates for Unit 3 have not changed since the filing of the VCM 26 report, with a projected in-service date for Unit 3 during the fourth quarter 2022 or the first quarter 2023. The achievability of these dates is subject to current and future challenges, including construction productivity, the volume of construction remediation work, the pace of system and area turnovers, the completion of documentation which includes inspection records (“IRs”), and the progression of startup and other testing. Additional delays could result in a Unit 3 in-service date beyond the first quarter of 2023.

The following table summarizes Southern Nuclear’s planned timing for the remaining major milestones for Unit 3, as well as the projected timing of milestones included in the Risk Adjusted Schedule.

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| --- | --- | --- |
| Table 1A - Unit 3 Comparison to Risk Adjusted Schedule | | |
| **Unit 3 Major Milestone** | **March 2022**  **Site Work Plan** | **December 2022 – March 2023**  **Risk Adjusted Schedule** |
| Hot Functional Testing | July 2021 (Actual) | |
| 103(g) Letter Received | May 2022 | August 2022 – September 2022 |
| Fuel Load | June 2022 | August 2022 – October 2022 |
| Commercial Operation Date | October 2022 | December 2022 – March 2023 |

Q. HOW HAS UNIT 4 PROGRESSED since the VCM 26 Report?

**A**. The projected in-service date for Unit 4 has not changed since the filing of the VCM 26 report with an in-service date during the third or fourth quarter 2023 and the Project team is working towards a more aggressive site work plan that currently assumes a second quarter 2023 in-service date. Recently, the progress on Unit 4 has slowed due to some craft and support resources being diverted from Unit 4 temporarily to support construction close-out efforts on Unit 3. Even with this diversion of resources, Construction continues its efforts to add targeted field non-manual support resources and craft labor, particularly electricians, in an effort to increase production.

Project leadership continues to believe that working toward a challenging schedule is the best strategy to maintain the focus and drive of the Project, identify and mitigate risks early, and ultimately support the Project’s objective of safely and successfully reaching commercial operation.

The table below shows a comparison of milestone dates between the current Unit 4 site work plan and the projected timing of milestones included in the Risk Adjusted Schedule.

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| --- | --- | --- |
| **Table 1-B – Unit 4 Comparison to Risk Adjusted Schedule** | | |
| **Unit 4 Major Milestone** | **March 2022 Site Work Plan** | **September 2023 – December 2023 Risk Adjusted Schedule** |
| Structural Integrity Test (“SIT”)/ Integrated Leak Rate Test (“ILRT”) | February 2022 (Actual) | |
| Cold Hydro Testing Start | August 2022 | October 2022 – January 2023 |
| Hot Functional Testing Start | October 2022 | December 2022 – March 2023 |
| Fuel Load Start | January 2023 | April 2023 – July 2023 |
| Commercial Operation Date | May 2023 | September 2023 – December 2023 |

1. CONSTRUCTION and TEsting PROGRESS

Q. How is construction progressing at the Site?

**A.** As of the end of March 2022, total construction on the Project is approximately 97% complete after including site-specific balance of plant (“BOP”) structures. Unit 3 direct construction, consisting of Bechtel’s current scope of work (plus direct scope completed in the Unit 3 power block prior to Bechtel), is approximately 99% complete. Remediation efforts are ongoing which is not factored into the percent complete, but also have contributed to construction progress as can be seen by inspection record closures which is discussed further in the testimony. Unit 4 direct construction is approximately 93% complete and BOP is approximately 98% complete.

Q. WHAT IS THE STATUS OF UNIT 3 FUEL LOAD?

**A.** The Site Operations team continues to perform surveillances to ensure conditions and testing requirements are met prior to loading fuel as preparations for Startup Testing continues. Also, the Project now has 72 licensed operators for Unit 3, which is sufficient to support Fuel Load and Startup Testing. Unit 3 Fuel Load could occur before the end of the second quarter 2022, but a Fuel Load date as late as October 2022 should support an in-service date in the first quarter 2023.

Prior to initial Fuel Load, and following Southern Nuclear’s final ITAAC submission, the NRC will issue the 52.103(g) finding (also known as the 103(g) letter), which will authorize Unit 3 to operate in accordance with the combined license. After the 103(g) finding is issued by the NRC, Unit 3 will transition into the plant’s operating programs. The Project team continues their efforts to complete all necessary inspections and documentation completions to support ITAAC submittals.

The site has received all 157 fuel assemblies required to support Fuel Load. These assemblies have been placed into the Spent Fuel Pool for storage. In February of this year, the two neutron sources that help start the reaction necessary to support initial criticality were also placed in the Spent Fuel Pool for storage.

Fuel Load on Unit 3 depends on the completion of significant documentation, including IRs and work packages, as well as component and pre-operational tests. The completion of these tasks, particularly the completion of the backlog of IRs, is challenging the site work plan date for Fuel Load but is withing the Risk Adjusted Schedule for Unit 3. In an effort to mitigate these risks, the site team has increased the number of quality control and engineering resources and improved cross-functional communication to ensure the closure process is as efficient as possible.

Q. PLEASE DISCUSS THE PROGRESS OF SYSTEM TURNOVERS AND TESTING for UNit 3.

**A.** Currently 156 systems have been turned over from Construction to the Initial Test Program (“ITP”) group. All systems in support of the 103(g) milestone have been turned over from Construction to ITP, and seven systems remain to be turned over for testing in support of Fuel Load. Daily meetings on site are structured to review the most critical paths and to ensure the support organizations are aligned based on the criticality of the activity to the individual sub-divided scope and the milestone as a whole.

The pace of system turnovers has slowed in recent months as the project teams have focused on electrical commodity installation completion, identified and resolved outstanding work items remaining for documentation closure in support of ITAAC submittals, and in support of Fuel Load.

Q. PLEASE PROVIDE AN UPDATE ON THE STATUS OF THE ITAAC SUBMITTALS.

**A.** All of Unit 3 and Unit 4’s Uncompleted ITAAC Notifications (“UINs”) have been submitted. As discussed in prior testimony, ITAAC Closure Notifications (“ICNs”) for both units have been and will be submitted following satisfaction of the acceptance criteria in the ITAAC. Through March 31, 2022, 319 of 398 Unit 3 ICNs and 115 of 393 Unit 4 ICNs have been submitted. For Unit 3, the remaining 79 ICNs will be submitted in the coming months.

Southern Nuclear and NRC staff continue to communicate regularly to identify, discuss, and resolve ITAAC-related matters. NRC’s internal procedure for issuance of the 52.103(g) finding seeks to mitigate the time between submission of the final ITAAC and the issuance of the 52.103(g) finding to a maximum of 17 days. The Project team expects that all ITAAC ICNs will be submitted in a timely fashion upon their completion and that the NRC will have adequate resources to support its review.

**Q. What is the status of Open Vessel and cold hydro testing on unit 4?**

**A.** Unit 4 continues to make progress on OVT, which is projected to be completed in the coming months. The ITP group has successfully completed many component tests in support of the remaining OVT testing sequences. OVT includes flow measurement, pump performance, line resistance, and tank mapping testing for the major systems flushed during IF. Measurements obtained during OVT ensure that safety and defense-in-depth systems and components function properly to support pre-operational testing and meet the design requirements for protection of the plant and the public during normal and emergency operating conditions.

The site is preparing for Cold Hydro testing, which is scheduled to begin later this year. Cold Hydro testing verifies the integrity of the primary system at operating pressure. These milestones are important to the successful startup and operation of the plant and will lay the foundation for commercial operations.

1. COVID-19 impact and Response

q. please provide an update on the covid-19 impacts on site.

**A.** The Project continues to navigate the effects of COVID-19 on its workforce, cost, and schedule. Protecting the health and safety of the Vogtle Units 3 and 4 team and the surrounding community remains the highest priority for the Project.

The Site team continues to monitor the state of the pandemic, and adjust protocols as appropriate to reduce the potential for further impacts on the Project. The overall long-term impact of the pandemic on cost and schedule remains difficult to state definitively at this time but Georgia Power’s share has been estimated to cost in the range of $160-200 million and three to four months of schedule margin.

1. project challenges

Q. what are the Primary challenges facing the project today?

A. The Project has continued to face significant challenges to performance, specifically for Unit 3 in the area of documentation closure, which has delayed transition of craft and field non-manual resources to Unit 4 and impacted production on Unit 4. As the Project team continues to move toward completion on Unit 3, documentation completion challenges production on the Unit. Documentation completion continues to be a major focus for the Site team, and several efforts are underway to complete the required documentation necessary to achieve successful startup and commissioning. In the recent weeks, significant progress has been made in the closure of IRs and other project documentation. The Project team continues to prioritize safety and quality ahead of schedule and the Project team is working closely with Bechtel and subcontractors to support their efforts to increase production in a safe and quality manner.

Q. PLEASE provide an update on the Unit 3 remediation work.

A. The Project team has made significant progress with remediation work for Unit 3. The Project continues to employ a critical path and near critical path strategy for the completion of remaining work. As previously discussed, this strategy ensures the resources remain collectively focused on achieving the same near-term goals as the Project progress towards the 103(g) and Fuel Load milestones. The success of this process is best demonstrated by the positive results of the recent NRC follow-up visit.

**Q.** Please provide an update on the Project’s documentation closure efforts.

**A.** The Project continues to progress with the completion of documentation closure. As discussed in the past, the closure of documentation demonstrating the Plant is constructed according to the design and per the required codes, is an essential aspect of completing a nuclear power plant. The completion of the IRs and work packages encompasses the verification of numerous aspects of the construction process, and confirms the Plant is constructed according to design and the required codes.

The resources focused on the completion of the IRs are transitioning their focus to the closure of work packages as the physical work and documentation required to ensure the plant is built to the required specification is completed. The Project team remains committed to ensuring the Plant is constructed and will operate safely, which includes the completion of documentation required to demonstrate adherence to design and the required codes.

q. IS the project team leveraging snc fleet resources to assist in preparing unit 3 for operations?

A. Yes. As Unit 3 approaches Fuel Load, Project Leadership has engaged the broader Southern Nuclear fleet to provide support and oversight of the Operations team. An integrated plan to transition from a construction site to an operating reactor is in place. We are now completing final work and testing to support the 103(g) finding letter and Fuel Load and concurrently the operating fleet has increased engagement to assist in a successful commissioning phase. As part of this plan, remaining work is prioritized to support the upcoming operating modes and oversight and support are in place to assure the readiness of the operating team. The work is appropriately prioritized to ensure the successful operation of the unit at the same level of performance excellence that is demonstrated by the existing Southern Nuclear fleet.

q. what steps Are the project taking to prevent a repeat of quality issues and documentation challenges on unit 4?

a. Project Leadership continues to implement short- and long-term corrective actions based on our root cause analyses and lessons learned from Unit 3. Project Leadership has also increased the use of SNC-led oversight teams with a focus on quality of electrical commodity installations and effectiveness of the Corrective Action Program. Trending tools are utilized to improve visibility into in-progress work and assist with focusing the efforts of the oversight teams tasked to identify opportunities for further improvement and implement additional lessons learned from Unit 3 for Unit 4. Southern Nuclear continues to review Bechtel and the subcontractors’ quality programs and will implement improvement plans, as needed, to minimize future quality issues.

Regarding improvement in Unit 4 documentation closures to mitigate the challenges discussed on documentation closure for Unit 3, the project has taken actions to improve construction actions in Unit 4. Specifically, the Project Leadership continues to emphasize sign-as-you-go and implements the changes and actions identified in the previous Root Causes that are material to satisfactory documentation closure. Electrical completion in Unit 4 continues to pose challenges for work package closure and the project leadership continues to evaluate improvements to mitigate future backlog development.

q. PLEASE describe the potential challenges FACING THE PROJECT during startup and commissioning.

A. While not expected, it is possible the Project will experience an unanticipated challenge that would impact the forecasted in-service dates due to the first of a kind technology. During Startup Testing, Operators will utilize the general operating procedures for the first time to bring the plant from cold shutdown to initial criticality, synchronize the Unit to the grid, and achieve power ascension through multiple steps, ultimately raising power to 100%.

During Unit 3 HFT, the Project successfully operated the plant at designed temperature and pressure without fuel in the reactor. With Reactor Coolant Pumps (“RCPs”) being the only heat source during HFT, minimal steam was generated for Turbine testing and not all the secondary steam supply systems were operated. Therefore, it is expected that the remaining secondary steam supply systems will be tested for the first-time during startup when it reaches 100% power with nuclear fuel inside the reactor. The organization is well equipped and has sufficient licensed operators to address challenges that may arise during startup and commissioning.

Q. please describe UNIT 4’s current productivity challenges.

a. As Unit 4 continues to progress through construction and its transition into further testing, the Project team’s challenges remain in electrical installation, first-time quality, and work package closure. These challenges have been exacerbated by the need to transfer resources to support Unit 3 work completion activities. The transfer of electrical craft resources from Unit 3 to Unit 4 has started and will provide support for electrical commodity installation.

Focus remains on constructing the plant in a safe and quality manner. The Project team’s focus is on quality electrical commodity installation. This includes planning future work to ensure that the necessary work is completed in the appropriate order to align with Project schedule. Further, alignment on craft and field non-manual staffing is reviewed to ensure that the necessary resources are available to support the alignment in scope mentioned previously. These steps are expected to help mitigate the impacts of the resources that have been transferred to Unit 3.

Throughout the Reporting Period, the Quality Control organization on site has worked to draw down the backlog of Quality Control inspection items on Unit 4. This reduction of backlog allows the team to continue to focus on first time quality and is an important lesson learned from Unit 3. By keeping the backlog of items to be inspected low, the team can quickly assess unsatisfactory quality trends and work to identify and correct them before they become a larger issue.

The Project continues to onboard craft and field non-manual resources to address the staffing and productivity needs of the Project. In the coming months, staffing on Unit 3 will begin to shift back to Unit 4 as remediation and documentation closure work draws to a close. The return of staffing to Unit 4 will provide a knowledge base on construction quality and lessons learned on Unit 3 construction. However, until the work is completed on Unit 3 and resources are completely transferred back to Unit 4, construction productivity will remain challenged.

1. COST FORECAST

Q. Please DISCUSS any updates to THE total capital forecast FOR THE PROJECT since VCM 25.

A. Southern Nuclear utilizes its Project Controls processes and tools to manage project costs and evaluate risks as part of the monthly cost forecasting process. As stated in the VCM 26 Report, following the contingency replenishment and schedule adjustments that occurred in the third and fourth quarters of 2021, Georgia Power’s projected share of the total Project cost increased by $745 million to $10.0 billion with the Company adding $646 million to the capital cost forecast for costs primarily associated with schedule extensions, construction productivity, the pace of system turnovers, and support resources for Units 3 and 4 as well as the addition of $99 million to replenish construction contingency.

1. Conclusion

Q. HOW WOULD YOU DESCRIBE THE PROGRESS DURING THE REPORTING PERIOD?

**A.** The Project continues to work towards the completion of Units 3 and 4. Project Leadership continues to create a safe environment in which the Project can operate and regularly identifies and incorporates opportunities to improve performance.

The Project team remains committed to the safety of the personnel at the site and the surrounding community, while also focused on executing the site work plan to bring both Units online. In 2021, the Project team performed with the fewest number of recordable incidents since 2015, a trend that the Project team continued through the first quarter of this year. Project Leadership continues to implement process improvements for planning, scheduling, and coordination of work as we continue our focus on opportunities to complete major testing evolutions timely and safely, improve performance, and further reduce risk as the Project transitions through testing, startup, and into operations.

Q. Does this conclude your testimony?

**A**. Yes.