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Vice President, Nuclear Operations
803-345-4214

SCE&G®
A SCANA COMPANY

September 29, 2006
RC-06-0173

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Mr. Robert E. Martin

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST - LAR 05-2926
IMPLEMENTATION OF WCAP-14333-P-A, REV. 1, "PROBABILISTIC RISK
ANALYSIS OF THE RPS AND ESFAS TEST TIMES AND COMPLETION
TIMES" -
SUMMARIZED LIST OF COMMITMENTS

Reference: 1. J. B. Archie, SCE&G, Letter RC-06-0158, to Document Control Desk,
USNRC, dated August 31, 2006
2. J. B. Archie, SCE&G, Letter RC-06-0087, to Document Control Desk,
USNRC, dated May 31, 2006
3. J. B. Archie, SCE&G, Letter RC-05-0143, to Document Control Desk,
USNRC, dated 11/15/2005

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South
Carolina Public Service Authority, hereby submits a summarized list of regulatory commitments
pursuant to a telephone conference between Arnie Cribb, SCE&G, Cliff Doutt, NRC, and
yourself on August 28, 2006, related to the above referenced license amendment request
(LAR). The LAR proposes changes to the V. C. Summer Nuclear Station (VCSNS) Reactor
Trip System Instrumentation and Engineered Safety Feature Actuation System Instrumentation
Allowed Outage and Bypass Test times.

Commitments 1 through 4 were identified in Reference 3. Commitments 5 and 6 are located in
Reference 2 in Response 3 and Response 9.4. Commitment 7 was identified in Reference 1.
These commitments have been captured in the VCSNS Corrective Action program in CER 05-
2926.

If you have any questions or require additional information, please contact Mr. Robert G. Sweet
at (803)-345-4080.

I certify under penalty of perjury that the foregoing is true and correct.

9/29/06
_____
Executed on

_____
Jeffrey B. Archie

AJC/JBA/dr
c: see page 2

A001

Attachment(s):
1. List of Regulatory Commitments

c: K. B. Marsh
    S. A. Byrne
    N. S. Carns
    J. H. Hamilton
    R. J. White
    W. D. Travers
    NRC Resident Inspector
    P. D. Ledbetter
    K. M. Sutton
    T. P. O'Kelley
    RTS   (LAR 05-2926)
    File   (813.20)
    DMS   (RC-06-0173)

LIST OF REGULATORY COMMITMENTS

VCSNS will implement administrative controls to include the following restrictions when a logic cabinet is unavailable.

1. Activities that degrade the availability of the emergency feedwater system, RCS pressure relief system (pressurizer PORVs and safety valves), AMSAC, or turbine trip, should not be scheduled when a logic cabinet is inoperable for maintenance.

2. One complete ECCS train that can be actuated automatically must be maintained when a logic train is inoperable for maintenance.

3. Activities that cause master relays or slave relays in the available train and activities that cause analog channels to be unavailable should not be scheduled when a logic train is inoperable for maintenance.

4. Activities on electrical systems (e.g., AC and DC power) and cooling systems (e.g., service water and component cooling water) that support systems of functions listed in the first three bullets should not be scheduled when a logic cabinet is inoperable for maintenance. That is, one complete train of a function that supports a complete train of a function noted above must be available.

In addition:

5. VCSNS will develop a procedure specifically to monitor the components affected by this LAR including logic cabinets, master relays, slave relays, and analog channels. The assumptions regarding component unavailability due to test and maintenance activities in the analysis supporting WCAP-14333 will be evaluated to ensure that the intent of these assumptions are met at VCSNS.

6. The VCSNS PRA and EOOS will be updated to include representative signals to model the reactor trip and ESFAS to the appropriate depth to perform Tier 3 evaluations. Signals not explicitly modeled will either be added to the model or addressed by surrogates.

7. As described in PRA Evaluation 06-05, V. C. Summer will change PRA fault tree gate EFW-MDPB-ACT from an "and" gate to an "or" gate on the next PRA update.