



October 19, 2006
RC-06-0186

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

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
LETTER OF INTENT TO ADOPT NFPA 805, "PERFORMANCE-BASED
STANDARD FOR FIRE PROTECTION FOR LIGHT WATER REACTOR
GENERATING PLANTS, 2001 EDITION"

This letter serves to inform you of Virgil C. Summer Nuclear Station's (VCSNS) intent to adopt National Fire Protection Association (NFPA) Standard 805, "Performance – Based Standard for Fire Protection for Light Water Reactor Generating Plants, 2001 Edition," in accordance with 10 CFR 50.48(c).

The transition to the performance-based standard for fire protection is expected to commence in January of 2007 and will take approximately 36 months to complete. The NFPA 805 transition process will proceed in three phases:

Phase I – Preliminary Assessment of the Fire Protection Program

- Technical and regulatory assessments performed to determine the feasibility and practicality of performing the transition

Phase II – Reviews and Engineering Analysis

- Completion of the Fire Protection Probabilistic Risk Assessment (PRA)
- Fundamental Fire Protection Program and Design Elements review
- Nuclear Safety Performance Criteria Transition review
- Non-Power Operational Mode Transition review
- Radiological Release Transition review
- Change Evaluations
- License Amendment Request

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Phase III – Implementation

- Program Documentation
- Configuration Control
- Monitoring

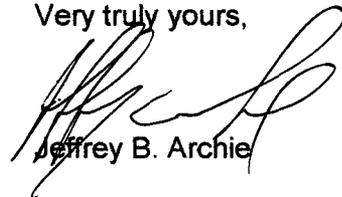
The process will be considered complete upon receipt of the License Amendment authorizing the transition to NFPA 805.

The NRC Interim Enforcement Discretion Policy (71 FR 19905, April 2006, and Regulatory Guide 1.205, May 2006) established NRC policy regarding enforcement discretion for certain noncompliances related to fire protection programs and the transition to 10 CFR 50.48(c). As outlined in the Enforcement Policy, enforcement discretion begins with the licensee's letter of intent. The Enforcement Policy also provides for extension of the discretion period if adequate justification is provided.

Because the transition to the NFPA 805 performance-based standard is a voluntary initiative, this correspondence contains no regulatory commitments.

Should you have any questions, please call Mr. Robert G. Sweet at (803) 345-4080.

Very truly yours,



Jeffrey B. Archie

MWD/JBA/mb
Attachment

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