



September 28, 2007

RC-07-0144

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  
PROPOSED CHANGES TO EMERGENCY ACTION LEVELS

In accordance with the requirements of the Code of Federal Regulations, Title 10, Part 50, Appendix E, Section IV.B.(1), South Carolina Electric & Gas Company (SCE&G) requests NRC review and approval for a proposed change to the emergency action levels (EALs) used at the Virgil C. Summer Nuclear Station (VCSNS).

SCE&G proposes to change the emergency action levels from a scheme based on NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," to a scheme based on NEI 99-01, Revision 4, "Methodology for Development of Emergency Action Levels." Such a change in scheme requires NRC approval prior to implementation.

The revised EALs will be implemented as two charts, one based on hot operating conditions and one based on cold operating conditions. Initiating conditions that are applicable in either hot or cold conditions are provided on both charts. The two proposed EAL charts are provided in electronic form on the reference CD.

Attachment I provides the Technical Bases Document for the proposed VCSNS EALs. The bases document includes the necessary plant specific information. The bases document was prepared so that the generic bases discussions of the EALs show changes from NEI 99-01 when the MS Word Track Changes tool is turned on. The format will help the reader see the differences that have been made between the NEI and VCSNS bases. The bases document also contains numerous embedded comments. The comments help explain differences in the bases discussions and to point the reader to various VCSNS-specific source documents referenced in the bases. A second version of the Technical Bases Document with all changes accepted is also provided.

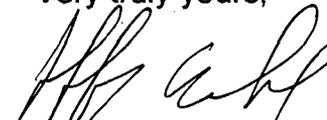
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Attachment II provides a comparison matrix between the NEI 99-01, Revision 4, (and applicable portions of NEI 99-01 draft Revision 5, 8/22/2007) EALs and the proposed VCSNS EALs. This matrix identifies and provides justification for any differences or deviations from the NEI 99-01 EALs.

Nuclear Regulatory Commission approval of the proposed EALs is requested by July 1, 2008.

If you have any questions, please contact Mr. Bob Williamson at (803) 345-4464.

Very truly yours,



Jeffrey B. Archie

SBR/JBA/dr  
Attachment

c: Without Attachment Unless Noted

K. B. Marsh	
S. A. Byrne	
N. S. Carns	
J. H. Hamilton	
R. J. White	
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NSRC	with/Electronic Attachment
RTS (CR-07-01705)	
File (815.01)	
PRSF (RC-07-0144)	with/Electronic Attachment