



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

October 29, 2007

South Carolina Electric & Gas Company
ATTN: Mr. Jeffrey B. Archie
Vice President, Nuclear Operations
Virgil C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION - NRC EMERGENCY
PREPAREDNESS INSPECTION REPORT 05000395/2007501

Dear Mr. J. Archie:

On October 5, 2007, the U.S. Nuclear Regulatory Commission (NRC) completed an Emergency Preparedness inspection at your V. C. Summer Nuclear Station. The enclosed inspection report documents the inspection results, which were discussed on October 5, 2007, with you, and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Brian R. Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Docket Nos. 50-395
License Nos. NPF-12

Enclosure: NRC Inspection Report No. 05000395/2007501 w/Attachment: Supplemental Information

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 50-395
License No.: NPF-12
Report No: 05000395/2007501
Licensee: South Carolina Electric and Gas
Facility: Virgil C. Summer Nuclear Station
Location: 576 Stairway Road
Jenkinsville, SC 29065
Dates: October 1 - 5, 2007
Inspectors: Lee Miller, Senior Emergency Preparedness Inspector
John Zeiler, Senior Resident Inspector
James Polickoski, Resident Inspector
Carl Moore, Operations License Examiner
Approved by: Brian R. Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000395/2007501; 10/01-05/2007; Virgil C. Summer Nuclear Station; Exercise and Baseline Inspection.

The report covered an announced inspection by one emergency preparedness inspector, one senior resident inspector, one resident inspector and one operations license examiner. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

A. NRC-Identified and Self-Revealing Findings

None

B. Licensee-Identified Violations.

None

Enclosure

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation

a. Inspection Scope

Prior to the inspection activity, the inspector conducted an in-office review of the exercise objectives and scenario submitted to the NRC to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle.

The onsite inspection consisted of the following review and assessment:

- The adequacy of the licensee's performance in the biennial exercise conducted on October 2, 2007, was reviewed and assessed regarding the implementation of the Risk Significant Planning Standards (RSPSs) in 10 CFR 50.47 (b)(4), (5), (9), and (10), which address emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the Control Room simulator, Technical Support Center (TSC), Operations Support Center (OSC) and Emergency Operations Facility (EOF).
- Other performance areas besides the RSPS, such as the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS) exercise reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The post-exercise critique process and the presentation to the licensee's senior management conducted on October 4, 2007, to evaluate the licensee's self-assessment of its ERO performance during the exercise and to ensure compliance with 10 CFR 50 Appendix E.IV.F.2.g.

The inspector reviewed various documents which are listed in the Attachment to this report.

Enclosure

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level (EAL) and Emergency Plan Changes

a. Inspection Scope

The inspector's review of revisions to the emergency plan, implementing procedures, and EAL changes was performed to determine that changes had not decreased the effectiveness of the plan. The inspector also evaluated the associated 10 CFR 50.54(q) reviews associated with non-administrative emergency plan, implementing procedures, and EAL changes. The Summer Emergency Plan Procedures changes were reviewed for the period from July 1, 2006 to October 1, 2007.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes." The applicable planning standard (PS), 10 CFR 50.47(b)(4) and its related 10 CFR 50, Appendix E requirements were used as reference criteria. The criteria contained in NUREG-0654, Appendix 1, Emergency Action Level Guidelines for Nuclear Power Plants, Revision 1 and Regulatory Guide 1.101 were also used as references. This inspection activity represents one sample on an annual basis.

The inspector reviewed various documents which are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspector sampled licensee submittals for the three Performance Indicators (PIs) listed below. For each of the submittals reviewed, the inspector looked at the period from April 1, 2006 to June 30, 2007. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Indicator Guideline," Revision 4, were used to verify the basis in reporting for each data element.

- Emergency Response Organization Drill/Exercise Performance (DEP)
- Emergency Response Organization Readiness (ERO)
- Alert and Notification System Reliability (ANS)

The inspector reviewed portions of the raw PI data developed from monthly performance indicator reports and discussed the methods for compiling and reporting the PIs with cognizant emergency preparedness personnel. The inspector also independently screened drill and exercise opportunity evaluations, drill participation reports, and drill evaluations. Selected reported values were calculated to verify their accuracy. The inspector compared graphical representations from the most recent PI report to the raw data to verify that the data was correctly reflected in the report.

The inspection was conducted in accordance with NRC Inspection Procedure 71151, "Performance Indicator Verification."

The inspector reviewed various documents which are listed in the Attachment to this report. This inspection satisfied three inspection samples for PI verification on an annual basis.

b. Findings

No findings of significance were identified.

4OA6 Meetings, including Exit

On October 5, 2007, the lead inspector for the emergency preparedness inspection presented the inspection results to Mr. J. Archie, and other members of his staff. The inspector confirmed that proprietary information was not provided or taken during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

S. Byrne, Senior Vice President - Generation and CNO
J. Archie, Vice-President Nuclear Operations
D. Gatlin, General Manager Nuclear Plant Operations
R. Haselden, Manager, Organizational Development and Performance
J. Nesbitt, Manager Materials and Procurement
L. Bennett, Manager Plant Support and Engineering
B. Williamson, Supervisor Emergency Preparedness
D. Lavigne, General Manager Organization Effectiveness
R. Fowlkes, General Manager Engineering
G. Lippard, Manager Operations
S. Zarandi, General Manager Nuclear Support Services
B. Thompson, Manager Nuclear Licensing

LIST OF DOCUMENTS REVIEWED

Section 1EP1: Exercise Evaluation

Plans and Procedures

EPP-001, Activation and Implementation of Emergency Plan, Rev. 29
EPP-001.2, Alert, Rev. 7
EPP-001.3, Site Area Emergency, Rev. 7
EPP-001.4, General Emergency, Rev. 7C
EPP-002, Communication and Notification, Rev. 34E
EPP-003, Plant Radiological Surveying, Rev. 13
EPP-005, Offsite Dose Calculations, Rev. 19F
EPP-015, Natural Emergency, Rev. 15
EPP-020, Emergency Personnel Exposure Control, Rev. 12
EPP-021, Activation of the Early Warning Siren System (EWSS), Rev. 19
EPP-023, Emergency Response Facilities, Rev. 14B
EPP-051, Emergency Operations Facility, Rev. 7
EPP-105, Conduct of Drills and Exercises, Rev. 6
EOP-1.0 Reactor Trip / Safety Injection Actuation, Rev. 22
EOP-2.0 Loss of Reactor or Secondary Coolant, Rev. 13
EOP-2.1 Post LOCA Cool Down and Depressurization, Rev. 13

Records and Data from 10/02/2007 exercise

EOF, JIC, OSC, and TSC - logs, Notification forms and PARs, off-site dose calculations, news releases, accountability logs, and documentation.

Corrective Action - Condition Reports

CR-07-02874, NRC questioned DEP Evaluation on simulator conducted 02/14/2007 for

Attachment

Scenario SA-015B. Evaluate difference in classification for scenarios.
 CR-07-02873, NRC identified siren silent test conducted on 5/30/2006 was not reported in PI.
 CR-07-02885, Exercise control items identified during 10/2/2007 Evaluated Exercise.
 CR-07-02884, Training related items identified during 10/2/2007 Evaluated Exercise.
 CR-07-02883, Facilities related items identified during 10/2/2007 Evaluated Exercise.
 CR-07-02882, Procedure related items identified during 10/2/2007 Evaluated Exercise.
 CR-07-02880, Emergency Notification inaccuracies identified during the 10/2/2007 Evaluated Exercise
 CR-07-02879, Review of Emergency Plan procedure revisions identified that 50.54(q) evaluation for EPP-015
 CR-07-02879, One player's performance during 07/21/2007 training drill was evaluated as inadequate. Individual was remediated by observing the 07/26/2007 remedial drill and critique.

Section 1EP4: Emergency Action Level (EAL) and Emergency Plan Changes

Change packages

EPP-001.4, General Emergency, Rev. 7 Change C
 EPP-002, Communication and Notification, Rev. 34E
 EPP-021, Activation of the Early Warning Siren System (EWSS), Rev. 19
 EPP-015, Natural Emergency, Rev. 15

Section 4OA1: Performance Indicator Verification

Procedures, Records, and Data

EPP-106, Emergency Preparedness Performance Indicator Procedure, Rev. 1
 PI Data packages for DEP, ANS, and ERO drill participation for July 1, 2006 - June 30, 2007
 Simulator Exercise Guide LOR-SA-017R, Rev. 5, 7/27/06
 Simulator Exercise Guide LOR-SA-075R, Rev. 6, 6/14/06
 Simulator Exercise Guide LOR-SA-080R, Rev. 1, 9/28/06
 Simulator Exercise Guide EPD-07-01A Rev. 0, 6/5/07

LIST OF ACRONYMS

ANS	Alert and Notification System (ANS) Testing
DEP	Emergency Response Organization Drill/Exercise Performance
DHS	Department of Homeland Security
EAL	Emergency Action Level
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
NEI	Nuclear Energy Institute
OSC	Operations Support Center
PI	Performance Indicator
PS	Planning Standard
RSPSs	Risk Significant Planning Standards
TSC	Technical Support Center