



Jeffrey B. Archie
Vice President, Nuclear Operations
803.345.4214

September 9, 2008
RC-08-0117

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

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
SUMP STRUCTURAL ANALYSIS FOR RESPONSE TO NRC
GENERIC LETTER 2004-02: POTENTIAL IMPACT OF DEBRIS
BLOCKAGE ON EMERGENCY RECIRCULATION DURING DESIGN
BASIS ACCIDENTS AT PRESSURIZED-WATER REACTORS

Reference: J.B. Archie to Document Control Desk, Supplemental Response to NRC
Generic Letter 2004-02, dated February 29, 2008, RC-08-0031

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby submits the Sump Structural Analysis which was referenced in the supplemental response (see reference above) to NRC Generic Letter 2004-02. The reference to this Sump Structural Analysis was identified on Page 68 of the attachment to the supplemental response.

It is requested that this Sump Structural Analysis be withheld from public disclosure pursuant to 10CFR2.390. Attached is a signed affidavit from Atomic Energy of Canada Ltd. who performed the analysis requesting the application for withholding from public disclosure.

There are no regulatory commitments provided in this submittal.

Should you have any questions, please call Mr. Bruce Thompson at (803) 931-5042.

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

9-9-08

Executed on

Day [Signature] for JBA
Jeffrey B. Archie

GAR/JBA/dr
Attachment

ALL
NRR

c: (Without Attachment unless noted)

K. B. Marsh

S. A. Byrne

N. S. Carns

J. H. Hamilton

R. J. White

K. J. Browne

L. A. Reyes (w/ attachment)

R. E. Martin (w/ attachment)

NRC Resident Inspector (w/ attachment)

M. N. Browne

K. M. Sutton

D. L. Abstance

NSRC

RTS (CR-08-02247) (w/ attachment)

File (815.14) (w/ attachment)

DMS (RC-08-0117) (w/ attachment)

**APPLICATION FOR THE U.S. NUCLEAR REGULATORY COMMISSION'S
WITHHOLDING, FROM PUBLIC DISCLOSURE, OF
AN ANALYSIS REPORT PREPARED BY AECL FOR
SOUTH CAROLINA ELECTRIC & GAS COMPANY**

10 C.F.R. § 2.390

**AFFIDAVIT OF VIRGIL C. SUMMER NUCLEAR STATION
& DOCKET No. 50/395**

I, Ravi Jategaonkar, Manager, Process Piping Engineering and Mechanics, Atomic Energy of Canada Ltd. (AECL), do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of AECL.
2. The information sought to be withheld ("Proprietary Document") consists of an Analysis Report, prepared by AECL, entitled "Seismic Analysis of Replacement Containment Sump Strainer." This Report was prepared by AECL for South Carolina Electric & Gas Company (SCE&G) in connection with SCE&G's Virgil C. Summer Nuclear Station.
3. The Proprietary Document includes technical calculations, analysis and recommendations that are based on AECL's proprietary methods and know how. Consequently, the Proprietary Document is highly sensitive from a commercial perspective and is held by AECL in confidence.
4. Public disclosure of the Proprietary Document would substantially harm AECL with respect to its ability to compete with other suppliers of similar analytical services.
5. The Proprietary Document constitutes confidential commercial and financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) because:
 - i. The Proprietary Document is confidential and has been held in confidence by AECL.
 - ii. The Proprietary Document contains information of a type that is customarily held in confidence by AECL. When AECL has transferred such information to third parties, it has imposed confidentiality obligations on the third parties with respect to such information. There is a rational basis for holding the Proprietary Document in confidence because it deals with sensitive commercial and financial matters. Public disclosure of such information would give an unfair advantage to AECL's competitors.

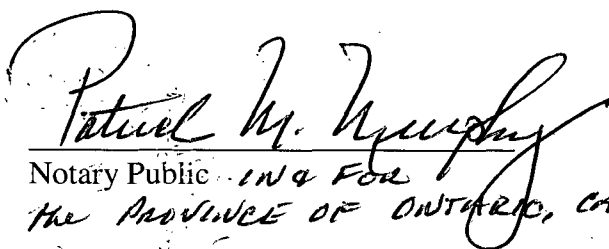
**CONTAINS CONFIDENTIAL COMMERCIAL AND FINANCIAL
INFORMATION OF ATOMIC ENERGY OF CANADA LTD. (AECL)
Submitted Under 10 CFR 2.390**

- iii. The Proprietary Document is being transmitted to the NRC in confidence.
 - iv. The Proprietary Document is not available in public sources and could not be gathered readily from other publicly available information.
 - v. Public disclosure of the Proprietary Document would cause substantial harm to the competitive position of AECL and its successors and affiliates.
6. For the reasons stated above, AECL requests that the Proprietary Document be withheld from public disclosure pursuant to the policy reflected in 10 C.F.R. § 2.390(a)(4) and because of the requirements of 10 CFR § 2.390(d). Furthermore, AECL submits the Proprietary Document to the NRC on the basis of its understanding that the NRC has agreed to limit dissemination of the Proprietary Document to NRC staff members who have a need to review the documents.



Dr. Ravi Jategaonkar
Manager, Process Piping Engineering and Mechanics
Atomic Energy of Canada Ltd. (AECL)

Subscribed and sworn before me this 17th day of July, 2008.



Notary Public *IN & FOR*
THE PROVINCE OF ONTARIO, CANADA