



December 22, 2008
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U.S. Nuclear Regulatory Commission
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Subject: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Combined License Application (COLA) - Docket Numbers 52-027 and 52-028 Response to NRC Request for Additional Information (RAI) Letter No. 007

Reference: Letter from Brian Anderson (NRC) to Alfred M. Paglia (SCE&G), Request for Additional Information Letter No. 007 Related to SRP Section 13.3 for the Virgil C. Summer Nuclear Station Units 2 and 3 Combined License Application, dated December 2, 2008.


The enclosure to this letter provides the South Carolina Electric & Gas Company (SCE&G) response to the RAI item included in the above referenced letter. The enclosure also identifies any associated changes that will be incorporated in a future revision of the VCSNS Units 2 and 3 COLA.

Should you have any questions, please contact Mr. Al Paglia by telephone at (803) 345-4191, or by email at apaglia@scana.com.

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

Executed on this 22nd day of December, 2008.

Sincerely,


Ronald B. Clary
General Manager
New Nuclear Deployment

AMM/RBC/am

D083
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Enclosure

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NRC RAI Letter No. 007 Dated December 2, 2008

SRP Section: 13.03 – Emergency Planning

Question from Containment and Ventilation Branch 1 (AP1000/EPR Projects) (SPCV)

NRC RAI Number: 13.03-3

Provide a description of the technical support center (TSC) habitability for Units 2 and 3.

The habitability and ventilation criteria for the TSC in Section 2.6 of NUREG-0696 is stated in the following two paragraphs:

Since the TSC is to provide direct management and technical support to the control room during an accident, it shall have the same radiological habitability as the control room under accident conditions. TSC personnel shall be protected from radiological hazards, including direct radiation and airborne radioactivity from inplant sources under accident conditions, to the same degree as control room personnel. Applicable criteria are specified in General Design Criterion 19; Standard Review Plan 6.4; and NUREG-0737, "Clarification of TMI Action Plan Requirements," Item II.B.2.

The TSC ventilation system shall function in a manner comparable to the control room ventilation system. The TSC ventilation system need not be seismic Category I qualified, redundant, instrumented in the control room, or automatically activated to fulfill its role. A TSC ventilation system that includes high-efficiency particulate air (HEPA) and charcoal filters is needed, as a minimum. Sufficient potassium iodide shall be provided for use by TSC and control room personnel. The capacity of the installed TSC ventilation filter system shall be independent of these thyroid-blocking provisions. If the TSC becomes uninhabitable, the TSC plant management function shall be transferred to the control room.

Although the originally designed Units 2 and 3's TSC is being relocated to Unit 1's TSC, it is expected that the same TSC habitability and ventilation, as stated above, will be met. However, Departure VCS DEP 18.8-1 does not provide this kind of confirmation.

The design basis for the TSC as described in DCD Sec. 9.4.1.1.2 is for the TSC located in the control support area. With the relocation of the TSC from the control support area to the protected areas, there now exists a lack of design information and justification as described above for the new TSC. The design information and justification needs to be provided.

VCSNS RESPONSE:

The Technical Support Center (TSC) for VCSNS Units 2/3 is a facility shared with VCSNS Unit 1, but is not the original TSC located within the protected area of VCSNS Unit 1. The shared facility is located approximately midway between Units 2/3 and Unit 1, and outside the protected areas of the units. This location provides the ability to respond and activate the facility in a timely fashion independent of the affected facility. The facility is designed to meet the intent and requirements of NUREG-0696 "Functional Criteria for Emergency Response Facilities" and NUREG-0737 "Clarification of TMI [Three Mile Island] Action Plan Requirements". This location departs from the guidance in NUREG-0696 in three areas: 1) that the TSC be located near the control room, 2) that the walking time from the TSC to the control room not exceed 2 minutes, and 3) that there be no major security barriers between the TSC and the control room. However, with vastly improved electronic communication capabilities, face to face interactions between TSC and control room personnel are no longer necessary to meet the intent of NUREG-0696 guidance. Also, this alternate location provides for improved off-hours staffing capabilities since responders will not have to process through protected area security and radiological control area access locations.

The TSC facility is designed to meet the protected envelope functional requirements for habitability and ventilation similar to the Control Room as identified in Section 2.6 of NUREG-0696 and Section II.B.2 of NUREG-0737.

This response is PLANT SPECIFIC.

ASSOCIATED VCSNS COLA REVISIONS:

None

ASSOCIATED ATTACHMENTS:

None