



February 13, 2009  
NND-09-0027

U.S. Nuclear Regulatory Commission  
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Washington, DC 20555

ATTN: Document Control Desk

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. 026

Reference: Letter from Manny Comar (NRC) to Alfred M. Paglia (SCE&G), Request for Additional Information Letter No. 026 Related to SRP Section 17.5 for the Virgil C. Summer Nuclear Station Units 2 and 3 Combined License Application, dated January 26, 2009.

The enclosure to this letter provides the South Carolina Electric & Gas Company (SCE&G) response to the RAI items 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](mailto:apaglia@scana.com).

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

Executed on this 13<sup>th</sup> day of February, 2009.

Sincerely,

Ronald B. Clary  
General Manager  
New Nuclear Deployment

JMG/RBC/jg

Enclosure

DOB3  
NRO

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**NRC RAI Letter No. 026 Dated January 26, 2009**

**SRP Section: 17.05 – Quality Assurance Program Description**

QUESTIONS from Quality and Vendor Branch 1 (AP1000/EPR Projects) (CQVP)

**NRC RAI Number: 17.5-8**

SRP 17.5

The V. C Summer QAPD Part II, Subsection 13.2, describes an exception to NQA-1 1994, Subpart 3.2, Appendix 2.1, "Nonmandatory Guidance on Cleaning of Fluid System and Associated Components for Nuclear Plants." The QAPD states that only section 3 precautions are being committed to in accordance with RG 1.37 and that a suitable chloride stress-cracking inhibitor should be added to the fresh water used to flush systems containing austenitic stainless steels. Please clarify to which revision of RG 1.37 is the applicant committed to in the QAPD and also provide your justification for taking exception to RG 1.37, Regulatory Position C.3.

**VCSNS RESPONSE:**

Part 13 of the V.C. Summer COL application, "Quality Assurance Program Description" (QAPD) was developed utilizing Revision 5 of NEI 06-14A which does not take exceptions to RG 1.37. The above referenced paragraph in the RAI is standard NEI 06-14A Revision 5 template text (ML081350560). Revision 6 of NEI 06-14A (ML083380310) also contains the above referenced text as standard template text. The V.C. Summer COL application will be revised in a future update to incorporate the appropriate approved version of NEI 06-14A with no deviations in this subsection from standard template text.

SCE&G is committed to Revision 1 of Regulatory Guide 1.37 for programmatic and/or operational aspects.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

No COLA changes have been identified as a result of this response.

**ASSOCIATED ATTACHMENTS:**

None