



February 23, 2009
NND-09-0040

U.S. Nuclear Regulatory Commission
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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. 019

Reference: Letter from Ravindra G. Joshi (NRC) to Alfred M. Paglia (SCE&G), Request for Additional Information Letter No. 019 Related to SRP Section 19 for the Virgil C. Summer Nuclear Station Units 2 and 3 Combined License Application, dated January 22, 2009.

The enclosure to this letter provides the South Carolina Electric & Gas Company (SCE&G) response to part of 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.

The response to NRC RAI Number 19-1 is still under development and review by SCE&G. The final response to that RAI is expected be provided to the NRC by March 16, 2009.

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 23rd day of February, 2009.

Sincerely,

Ronald B. Clary
General Manager
New Nuclear Deployment

AMM/RBC/am

Enclosure

c:

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NRC RAI Letter No. 019 Dated January 22, 2009

SRP Section: 19- Probabilistic Risk Assessment and Severe Accident Evaluation

Question from PRA Licensing, Operations Support and Maintenance Branch 1
(AP1000/EPR Projects) (SPLA)

NRC RAI Number: 19-2

STD COL 19.59.10-2 states that "The PRA will be updated to reflect these differences [between the asbuilt plant and design used as the basis for the AP1000 PRA and DCD Table 19.59-18] if they potentially result in a significant increase in core damage frequency or large release frequency."

- (a) Please clarify how the VC Summer PRA (to be completed by fuel load) will be updated to account for VC Summer site-specific information per 10 CFR 52.79(d)(1) and 10 CFR 50.71(h)(1) as well as asbuilt information.
- (b) Please define "significant increase."

VCSNS RESPONSE:

(a) The PRA will be updated as described in FSAR Subsection 19.59.10.5. The process for development of the plant specific PRA will include evaluation of plant as-built differences, departures from certified design and the results of the plant specific review of DCD Table 19.59-18. The update process described in FSAR Subsection 19.59.10.5 is consistent with the requirements of 10 CFR 52.79(d)(1) and 10 CFR 50.71(h)(1).

(b) Any difference in the AP1000 PRA-based insights of DCD Table 19.59-18 could potentially result in an increase in core damage frequency (CDF) or large release frequency (LRF). Plant specific PRA-based insight differences will be evaluated and the plant specific PRA model modified as necessary to reflect the plant specific design and the PRA-based insight; as such, the FSAR will be revised to remove "significant increase."

The response is considered to be STANDARD in order to bring the VCSNS COLA in alignment with the AP1000 reference plant.

ASSOCIATED VCSNS COLA REVISIONS:

In accordance with the AP1000 reference plant and information designated as STD, COLA Part 2, FSAR Chapter 19, subsection 19.59.10.5, second paragraph will be revised in a future revision of the COLA to read as follows:

A review of the differences between the as-built plant and the design used as the basis for the AP1000 PRA and DCD Table 19.59-18 will be completed prior to fuel load. ~~The PRA will be updated to reflect these differences if they potentially result in a significant increase in core damage frequency or large release frequency.~~ The plant specific PRA-based insight differences will be evaluated and the plant specific PRA model modified as necessary to account for plant-specific design and any design changes or departures from the design certification PRA.

In addition, the appropriate LMA's will be corrected to reflect that the material is standard.

ASSOCIATED ATTACHMENTS:

None