

## PMSummerColpEM Resource

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**From:** Ravindra Joshi  
**Sent:** Tuesday, February 17, 2009 8:36 AM  
**To:** SummerCOL Resource  
**Subject:** FW: Emailing: NND-09-0017.PDF  
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-----Original Message-----

From: KIBLER, TRIA K [mailto:TKKIBLER@scana.com]  
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MONROE, AMY; Manny Comar  
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February 2, 2009  
NND-09-0017

U.S. Nuclear Regulatory Commission  
Document Control Desk  
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. 012

Reference: Letter from Manny Comar (NRC) to Alfred M. Paglia (SCE&G), Request for Additional Information Letter No. 012 Related to SRP Section 17.5 for the Virgil C. Summer Nuclear Station Units 2 and 3 Combined License Application, dated December 31, 2008.

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 2nd day of February, 2009.

Sincerely,

A handwritten signature in black ink that reads "Ronald B. Clary".

Ronald B. Clary  
General Manager  
New Nuclear Deployment

CDT/RBC/jg

Enclosure

c:

Luis A. Reyes  
Ravindra G. Joshi  
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**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-1**

The Table of Contents of the V.C. Summer Quality Assurance Program Description (QAPD) under Part II QAPD Details, does not list Section II – Quality Assurance Program and its applicable subsections. Please revise the Table of Contents of the V.C. Summer QAPD to include Section 2 - Quality Assurance Program.

**VCSNS RESPONSE:**

The table of contents will be revised in the next update to include Section 2 – Quality Assurance Program.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

COLA Part 13, QAPD, Applicable portion from the Table of Contents will be revised to read:

1.10	NQA-1-1994 Commitment.....	5
<b>Section 2</b>	<b>Quality Assurance Program.....</b>	<b>8</b>
2.1	Responsibilities.....	9
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**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-2**

The V. C. Summer QAPD, Part III, Section 2, “Non-Safety-Related SSCs Credited for Regulatory Events,” states, that SCE&G shall implement quality requirements for Station Blackout (SBO) equipment in accordance with Regulatory Position 3.5, “Quality Assurance and Specific Guidance for SBO Equipment That Is Not Safety Related,” and Appendix A, “Quality Assurance Guidance for Non-Safety Systems and Equipment,” in Regulatory Guide (RG) 1.155, “Station Blackout.” In addition, consistent with SRP 17.5, Appendix IAA of the FSAR lists V. C. Summer’s conformance with NRC Regulatory Guides (RGs). The staff notes that Appendix IAA does not address conformance to RG 1.155. Accordingly, the staff requests the applicant to revise Appendix IAA of the V. C. Summer FSAR to address conformance with RG 1.155.

**VCSNS RESPONSE:**

Revision 6 of NEI 06-14A “Quality Assurance Program Description” adds bracketed text to Part III, Section 2, that states “NOTE: Applicability of this Regulatory Guide is technology specific.” Part III, Section 2 of the VCSNS Units 2 and 3 Quality Assurance Program Description (QAPD) will be revised and updated as indicated below. The QAPD will be revised in a future update to incorporate the applicable approved revision of NEI 06-14A.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

COLA Part 13, QAPD, Part III, Section 2, 4<sup>th</sup> paragraph will be revised to read:

~~SCE&G shall implement quality requirements for SBO equipment in accordance with Regulatory Position 3.5, “Quality Assurance and Specific Guidance for SBO Equipment That Is Not Safety Related,” and Appendix A, “Quality Assurance Guidance for Non-Safety Systems and Equipment,” in Regulatory Guide 1.155, “Station Blackout.”~~

“Regulatory Guide 1.155 is not applicable for the AP1000 design in accordance with certified design as shown in DCD Appendix 1A. Regulatory Guide 1.155 relates to the availability of safety related functions supported by AC power. Since AC power is not required to support the availability of safety-related functions, the guidance is not applicable.”

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**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-3**

Section 17.5 of the V. C. Summer Final Safety Analysis Report (FSAR) refers to the quality assurance program description (QAPD) provided in Part 13 of the V. C. Summer application. Part 1, Introduction, Section 1, General, of the QAPD states, in part, that SCE&G QAPD is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for construction/pre-operations and/or operation activities conducted by or for SCE&G. Section 1.1, Scope/Applicability, of the V. C. Summer QAPD states that the QAPD applies to COL/construction/pre-operation and/or operational activities, affecting the quality and performance of safety-related structures, systems, and components. Please clarify the use of the term "and/or" in the context described above.

**VCSNS RESPONSE:**

The term "and/or" will be revised in the affected portion of the QAPD to read "and."

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

COLA Part 13, QAPD, Part I, Section 1, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence will be revised (to remove "or") to read:

South Carolina Electric & Gas Co. New Nuclear Deployment Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for COL/construction/pre-operation and/or operation activities conducted by or for SCE&G.

COLA Part 13, QAPD, Part I, Section 1.1, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence will be revised (to remove "or") to read:

This QAPD applies to COL, construction/pre-operation and/or operations activities affecting the quality and performance of safety-related structures, systems, and components, including, but not limited to:



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**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-4**

Part 1, Section 1.1 of the QAPD lists the activities affecting quality to which the QAPD applies. Although this list is not all-inclusive, siting is listed as an activity affecting quality to which the QAPD applies. Since this QAPD would not become effective until COL issuance, please clarify how siting activities would be subject to its provisions.

**VCSNS RESPONSE:**

During the preparation of the site specific QAPD, the inclusion of “siting” in the list of activities included in the NEI 06-14A template was inadvertently retained. The RAI correctly identifies that by the COL issuance, the siting activities will be complete. Therefore, “siting” will be removed from this list of activities.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

COLA Part 13, QAPD, Part I, Section 1.1, listing of activities will be revised (to remove “Siting”) to read:

Construction      Testing      ~~Siting~~      Erecting      Modifying

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-5**

Part II, QAPD Details, Section 1 Organization states, in part, that SCE&G's New Nuclear Deployment (NND) organization is described in the QAPD. Appendix B to 10 CFR Part 50 states, in part, that every applicant for a combined license under 10 CFR part 52 is required by the provisions of section 10 CFR 52.79 to include in its FSAR, a description of the quality assurance applied to the design, and to be applied to the fabrication, construction, and testing of SSCs of the facility and to the managerial and administrative controls to be used to assure safe operation. Please provide the QAPD's description of the managerial organization for operations, including the functions of the following positions that are referred to in Section I, Section 2.6, and Section 2.7: President & Chief Operating Officer (SCE&G), NND Business and Financial Manager, Accounting Manager, Operational Quality Assurance Manager, Site Vice President, and Plant Manager. For additional guidance, please refer to TVA letter dated June 26, 2008 (BLN RAI ID: 341).

**VCSNS RESPONSE:**

COLA Part 13, QAPD, Part II, Section 1 will be revised to include the more detailed description of the managerial organization. Upon completion of construction activities, the NND Business and Financial Manager position and its functions will be absorbed into the existing Accounting Manager (SCANA) and Business and Financial Manager (SCE&G) positions which currently support V.C. Summer Unit 1.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

1. COLA Part 13, QAPD, Part II, Section 1 will be revised to read:

**PART II QAPD DETAILS**

**SECTION 1 ORGANIZATION**

This Section describes the SCE&G organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes support/off-site and on-site functions for New Nuclear Deployment including interface responsibilities for multiple organizations performing quality-related functions. Implementing

documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of this QAPD. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

SCE&G management is responsible to size the Quality Assurance organization commensurate with the duties and responsibilities assigned.

The SCE&G New Nuclear Deployment (NND) organization is responsible for new nuclear plant licensing, engineering, procurement, construction, startup and operations development activities. There are several organizations within SCE&G which implement and support the QAPD. These organizations include, but are not limited to NND, V. C. Summer Nuclear Station Unit 1 Procurement Group, Engineering, Training, Security, Emergency Preparedness, and SCANA Environmental Services.

Engineering, Procurement and Construction services are provided to the SCE&G NND organization by two primary contractors in accordance with their QAPDs. These two contractors are Shaw Stone & Webster and Westinghouse.

The following sections describe the reporting relationships, functional responsibilities and authorities for organizations implementing and supporting the NND QA Program. The SCE&G organization and the NND organization are shown in Figures II. 1-1 and II. 1-2, respectively.

### **1.1 SCANA Chief Executive Officer (CEO)**

The SCANA CEO is responsible for all aspects of SCANA and its subsidiary companies which includes SCE&G. ~~design, construction and operation of SCE&G's nuclear plants. The SCANA CEO is also responsible for all technical and administrative support activities provided by SCE&G and contractors.~~ The SCANA CEO directs the President & Chief Operating Officer (SCE&G), and who in turn directs the Senior Vice President, Generation and Chief Nuclear Officer in fulfillment of their responsibilities. The SCANA CEO reports to the SCANA Board of Directors with respect to all matters.

### **1.2 President and Chief Operating Officer (COO)**

As delegated from the CEO, the President & Chief Operating Officer (COO) is responsible for all aspects of SCE&G. The President and COO directs the Senior Vice President, Generation who in turn directs the General Manager, New Nuclear Deployment (GMNND).

### **1.3 New Nuclear Deployment**

SCE&G, New Nuclear Deployment organization is responsible for new nuclear plant licensing, engineering, procurement, construction, quality assurance startup and operational development activities for the V.C. Summer Units 2 and 3.

#### **1.3.1 General Manager, New Nuclear Deployment (GMNND)**

The ~~General Manager, New Nuclear Deployment (GMNND)~~ GMNND reports to the SCE&G Senior Vice President, Generation and is responsible for the administration of the NND QAPD. The GMNND also directs the planning and development of the NND staff and organization resources. The GMNND is also responsible for establishing and managing the Engineering, Procurement and Construction agreement (EPC) for the development of new nuclear generation.

### **1.4 V. C. Summer Unit 1 Support Organizations**

#### **1.4.1 General Manager, Engineering Services (GMES)**

The GMES is responsible for managing the Engineering organization at Unit 1. The Engineering Services organization is responsible for support of NND organization by providing engineering services using qualified personnel when necessary and the work is outside of the EPC agreement.

#### **1.4.2 General Manager, Nuclear Support Services (GMNSS)**

The GMNSS is responsible for managing the Emergency Preparedness (EP) organizations at Unit 1. The EP organization will support NND when necessary to meet regulatory requirements for construction and eventually operations of Units 2 and 3 under the NND QAPD.

#### **1.4.3 General Manager, Organizational Effectiveness (GMOE)**

The GMOE is responsible for managing the Security organization at Unit 1. The Security organization will support NND when necessary to meet regulatory requirements for construction and eventually operations of Units 2 and 3 under the NND QAPD.

### **1.5 Corporate Services**

The SCANA/SCE&G Corporate Services organizations are responsible for supporting the NND organization by performing activities related to accounting, safety and health, and environmental services where applicable. These organizations will serve the NND organization through a "dotted-line" report to NND managers. ~~For instance, the corporate accounting services personnel will report to the NND Business and Financial Manager for the services provided, but will be accountable to the Accounting Manager for all matters related to accounting business.~~

## **1.6 Senior Vice President, Generation (SVPG)**

The SVPG is the Chief Nuclear Officer (CNO) and is responsible for the safe, reliable, and efficient operation of SCE&G nuclear plant(s). The **SVPG CNO** directs the ~~operating plants'~~ Vice President, Nuclear Operations and the General Manager, New Nuclear Deployment. The Senior Vice President, Generation will support NND activities through the Vice President, Nuclear Operations, and the General Manager, New Nuclear Deployment, and the The Quality Assurance organization has direct access to the SVPG. The CNO reports to the President & COO.

### **1.6.1 Vice President, Nuclear Operations**

The Vice President, Nuclear Operations reports to the Senior Vice President, Generation and is responsible for the overall safe and efficient operation of the nuclear operating plant(s), and for the implementation of quality assurance requirements in the areas specified by the QAPD once the COL application has been approved or and at least 30 days prior to initial fuel load.

For the purposes of this program, the description of the duties of the Vice President, Nuclear Operations and the staff will be limited to those site activities that support the New Nuclear Deployment. Unit 1 currently has its own QAPD and will continue to follow the requirements of that program until such time that the three units combine their QAPDs.

#### **1.6.1.1 Site Project Organization**

The Site Project Organization is responsible for operations and maintenance of the respective plant site. The Site Project Organization is responsible for operations quality inspection activities of operations on-site work, including any that support New Nuclear Deployment COL application development, as well as controlling interfaces between the operating units and any preconstruction or construction activities. The New Nuclear Deployment organization is the responsible Site Project Organization.

### **1.6.2 NND Quality Assurance**

The SCE&G NND Quality Assurance Organization is responsible for independently planning and performing activities to verify the development and effective implementation of the SCE&G NND QAPD including but not limited to New Nuclear Deployment, engineering, licensing, document control, corrective action program and procurement that support new nuclear plant generation.

#### **1.6.2.1 Manager Quality Assurance Systems Supervisor**

The NND Supervisor Manager Quality Assurance Systems reports to the GMNND for all Quality Assurance activities and is responsible for developing and maintaining the SCE&G QAPDs, evaluating compliance to the programs and managing the QA

organization resources. The NND Manager Quality Assurance Systems Supervisor is also responsible for the development and verification of implementation of the QAPD described in this document. The NND Manager Quality Assurance Systems Supervisor is responsible for assuring compliance with regulatory requirements and procedures through audits and technical reviews; for monitoring organization processes to ensure conformance to commitments and licensing document requirements; for ensuring that vendors providing quality services, parts and materials to SCE&G are meeting the requirements of 10 CFR 50, Appendix B through Nuclear Procurement Issues Committee (NUPIC) or SCE&G vendor audits. The NND Manager Quality Assurance Systems Supervisor has sufficient independence from other NND priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas necessary regarding SCE&G's NND activities. The NND Manager Quality Assurance Systems Supervisor may make recommendations to the NND management regarding improving the quality of work processes. If the NND Manager Quality Assurance Systems Supervisor disagrees with any actions taken by the NND organization and is unable to obtain resolution, the NND Manager Quality Assurance Systems Supervisor shall inform the GMNND and bring the matter to the attention of the Senior Vice President, Generation who will determine the final disposition.

#### **1.7 NSSS Applicant for Certification or DC Holder – A/E**

Westinghouse is the NSSS supplier for Units 2 and 3 and provides engineering services for plant design and licensing of Units 2 and 3. These engineering services for new nuclear generation include site specific engineering and design necessary to support development of COL applications, preconstruction and construction activities.

Westinghouse and Shaw Stone and Webster have formed a consortium to support the engineering, procurement and construction of the Units 2 and 3 AP1000 Nuclear Plants.

#### **1.8 License Application**

Bechtel Power Corporation provides engineering services for the development of the COL application. These engineering services include site specific license engineering, and design activities necessary to support development of the COL application, and planning and support for preconstruction and construction of new nuclear generation.

#### **1.9 Authority to Stop Work**

Quality assurance and inspection personnel have the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or SSC integrity may be jeopardized. This extends to off-site work performed by suppliers furnishing safety-related materials and services to SCE&G.

**1.10 Quality Assurance Organizational Independence**

For the COL and construction, independence shall be maintained between the organization or organizations performing the checking (quality assurance and control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

**1.11 NQA-1-1994 Commitment**

In establishing its organizational structure, SCE&G commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.



2. Replace Figure II.1-1 in its entirety with the following:

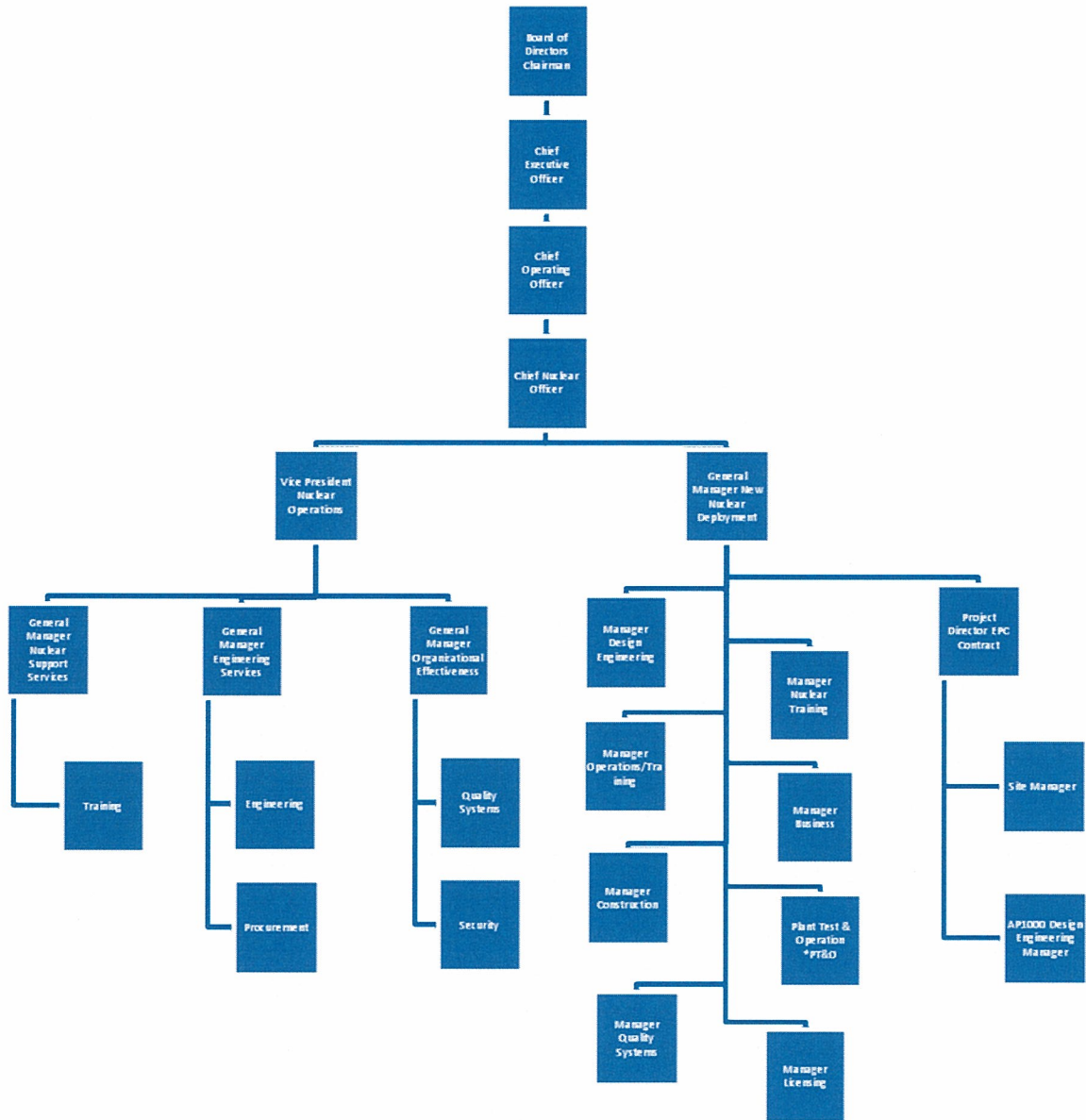
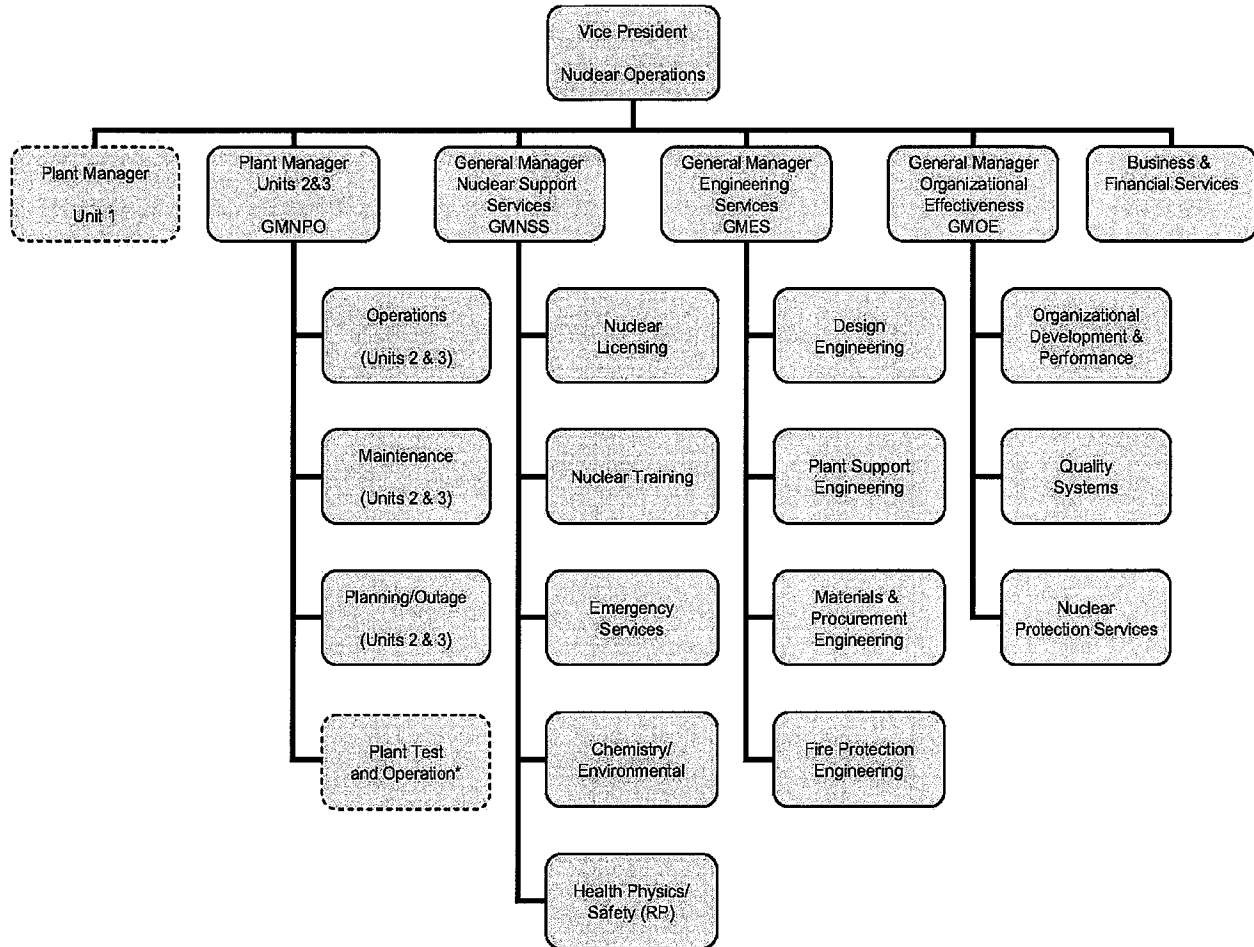


Figure II.1-1 SCE&G Organization

3. Replace Figure II.1-2 with the following:



**Figure II.1-2 Plant Management Organization**

\*During construction the functional manager, PT&O, reports to the GMNND. As the organization transitions into the operational phase the functional manager, PT&O, reports to the Plant Manager.

4. COLA Part 13, QAPD, Part II, Section 2.1 will be revised to read:

Personnel who work directly or indirectly for SCE&G are responsible for the achievement of acceptable quality in the work covered by this QAPD. This includes those activities delineated in Part I, Section 1.1 of this QAPD. SCE&G personnel performing verification activities are responsible for verifying the achievement of acceptable quality. Activities governed by the QAPD are performed as directed by documented instructions, procedures and drawings that are of a detail appropriate for the activity's complexity and effect on safety. Instructions, procedures and drawings specify quantitative or qualitative acceptance criteria as applicable or appropriate for the activity, and verification is against these criteria. Provisions are established to designate or identify the proper documents to be used in an activity, and to ascertain that such documents are being used. The Manager Quality Assurance Systems Supervisor is responsible to verify that processes and procedures comply with QAPD and other applicable requirements, that such processes or procedures are implemented, and that management appropriately ensures compliance.

5. COLA Part 13, QAPD, Part II, Section 2.5 will be revised to read:

Administrative control of the QAPD will be in accordance with 10 CFR 50.55(f) and 10 CFR 50.54(a), as appropriate. Changes to the QAPD are evaluated by the NND Manager Quality Assurance Systems Supervisor to ensure that such changes do not degrade previously approved quality assurance controls specified in the QAPD. This document shall be revised as appropriate to incorporate additional QA commitments that may be established during the COL application development process. New revisions to the document will be reviewed, at a minimum, by the SCE&G Manager Quality Assurance Systems Supervisor, GMNND, and approved by the Senior Vice President Generation.

Regulations require that the Final Safety Analysis Report (FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied. In order to comply with this requirement, the FSAR references this QAPD and, as a result, the requirements of 10 CFR 50.54(a) are satisfied by, and apply to, the QAPD.

6. COLA Part 13, QAPD, Part II, Section 2.7, item (e) will be revised to read:

Reviews any matter related to nuclear safety that is requested by the Site Vice President, Nuclear Operations, Plant Manager, or any NSRC member.

7. COLA Part 13, QAPD, Part II, Section 18.1, 2<sup>nd</sup> paragraph, last sentence will be revised to read:

These audits are conducted by trained personnel not having direct responsibilities in the area being audited and in accordance with preplanned and approved audit plans or checklists, under the direction of a qualified lead auditor and the cognizance of the Manager Quality Assurance Systems Supervisor.

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-6**

Pursuant to 10 CFR 52.79(a)(41), COL applicants must provide an evaluation of the facility against the Standard Review Plan (SRP) revision in effect 6 months before the docket date of the application. Where differences exist, the applicant's evaluation must discuss how the proposed alternative provides an acceptable method of complying with the Commission's regulations, or portions thereof, that underlie the corresponding SRP acceptance criteria. Regulatory Guide 1.206 Section C.I.17.5.3, states that COL applicants may use the existing QAPD that the NRC has approved for current use for either or both phases (if the QAPD is submitted in two phases), provided they identify and justify alternatives to, or differences from, the SRP in effect 6 months prior to the docket date of the application of a new facility. Section 17.1 of the V. C. Summer FSAR states that the existing V. C. Summer Unit 1, 10 CFR Part 50, Appendix B quality assurance program is used for safety-related site characterization activities and oversight of its contractors that have been delegated the responsibility of design activities prior to COL issuance. Table 1.9-202, Conformance with SRP Acceptance Criteria, states that the FSAR Position is acceptable with regards to SRP 17.1. Pursuant to 10 CFR 52.79(a)(41), please provide the evaluation of the existing V. C. Summer Unit 1 quality assurance program against the acceptance criteria in SRP 17.1.

**VCSNS RESPONSE:**

The existing QA program utilized by SCE&G is consistent with the QA Program Description contained with the V.C. Summer Nuclear Station (VCSNS) Unit 1 FSAR as invoked by the New Nuclear Deployment Quality Assurance Plan (NNDQAP) by text or reference. This existing operating QA program described in the VCSNS Unit 1 FSAR was reviewed and evaluated by the NRC and found acceptable utilizing the acceptance criteria of SRP Section 17. VCSNS Unit 1 FSAR invokes Regulatory Guide 1.28, Rev. 0, 6/72 "Quality Assurance Program Requirements (Design and Construction)". NNDQAP identifies how the existing company procedures that implement the VCSNS Unit 1 requirements are applied for the limited activities conducted in support of new nuclear plant development and construction. Design, procurement, and construction activities associated with VCSNS Units 2 and 3 that may occur before the COL is issued will be conducted in accordance with the existing SCE&G Unit 1 QA Program requirements. Design and construction activities that occur following COL issuance will be conducted in accordance with the QAPD submitted as Part 13 of the application and

is the QAPD that was evaluated and discussed in Table 1.9-202 for conformance to SRP 17.1.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

None

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 012 Dated December 31, 2008**

**SRP Section: 17.5 – Quality Assurance Program Description**

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

**NRC RAI Number: 17.5-7**

Appendix 1AA of the V. C. Summer FSAR lists V. C. Summer's conformance with NRC Regulatory Guides (RGs) and identifies any exceptions to conformance with those RGs. For those RGs that describe quality assurance-related requirements, Appendix 1AA appears to address the conformance of the QAPD provided in Part 13 of the COL application. However, since SCE&G is relying on its current version of the quality assurance program for V. C. Summer Unit 1 for activities prior to COL issuance, please explain how Appendix 1AA also addresses the existing V. C. Summer Unit 1 quality assurance program's conformance to the applicable RGs.

**VCSNS RESPONSE:**

As discussed in FSAR Section 17.1, the SCE&G quality assurance program for design, construction, and operations is defined in Section 17.5. Also stated, a version of the current QA program for VC Summer Unit 1 was used during site characterization and COLA preparation. SCE&G performs oversight of safety-related activities conducted by its contractors under their respective NRC approved QA program(s).

Site characterization activities have been conducted in accordance with applicable Regulatory Guides as discussed in FSAR Chapter 2. Also reference the NRC Audit Report for the SCE&G V.C. Summer COLA review (ML073100387).

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

None

**ASSOCIATED ATTACHMENTS:**

None