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803-345-4757

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April 2, 2009
NND-09-0070

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U. S. Nuclear Regulatory Commission
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George Fricks
Supervisor, Access Control & FD
South Carolina Electric and Gas Company
Date 4/3/09

Attention: Document Control Desk

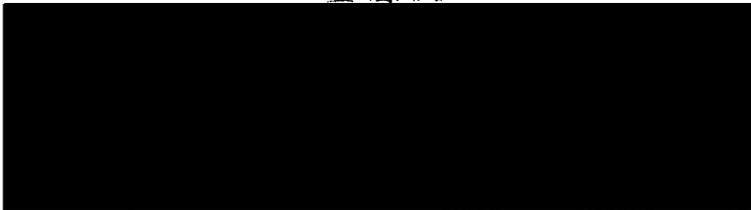
Subject: Virgil C. Summer Nuclear Station Units 2 and 3
Docket Numbers 52-027 and 52-028
Submittal of Proposed Revision 1 of Part 8 of the Combined License
Application for V. C. Summer Nuclear Station Units 2 and 3 – Security
Plan

References:

1. V. C. Summer Nuclear Station Letter NND-08-004 from Stephen A. Byrne to the Document Control Desk, dated March 27, 2008 that submitted a Combined License Application for V. C. Summer Nuclear Station Units 2 and 3.
2. NEI 03-12, Revision 6 dated March 18, 2009 "Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan."

By letter dated March 27, 2008 (Reference 1), the South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for the South Carolina Public Service Authority (also referred to as Santee Cooper), submitted a proposed Security Plan for V. C. Summer Nuclear Station (VCSNS) Units 2 and 3 in accordance with the requirements in 10 CFR 73.20. On March 27, 2009, the NRC published in the Federal Register (74 FR 13926 - 13993) the Final Rule related to Power Reactor Security Requirements. Enclosure 1 of this letter provides a proposed revision to the VCSNS Units 2 and 3 Security Plan that complies with the requirements of this Final Rule on Power Reactor Security Requirements. It is requested that this proposed revision to the VCSNS Units 2 and 3 Security Plan be reviewed with the VCSNS Units 2 and 3 combined license application (COLA) in accordance with 10 CFR 52.48, in lieu of the original Security Plan that was submitted by Reference 1. Following review by the NRC staff, this proposed revision will be incorporated as Revision 1 to Part 8, Safeguards / Security Plans, of the VCSNS COLA. **Enclosure 1 contains safeguards information and should be withheld from public disclosure in accordance with 10 CFR 73.20 and 10 CFR**

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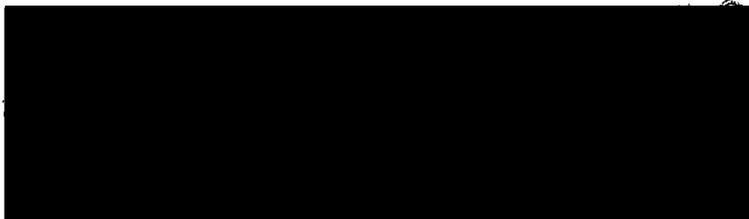
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The proposed revision to the VCSNS Units 2 and 3 Security Plan is consistent with the Nuclear Energy Institute (NEI) template, NEI 03-12, Revision 6, dated March 18, 2009, which was provided to the NRC for review and endorsement on March 25, 2009, and reflects additional minor changes that were provided to the NRC on March 30, 2009. SCE&G understands that NRC endorsement of NEI 03-12, Rev. 6 is imminent; however, should changes be made to this template in response to comments received during the endorsement review, these changes will be captured, as appropriate, in a future revision to the VCSNS Units 2 and 3 Security Plan. With few exceptions, the generic, non-bracketed text in the template is repeated verbatim in the proposed VCSNS Units 2 and 3 Security Plan revision. Enclosure 2 provides a listing of errata to the March 18, 2009 version of NEI 03-12, Rev. 6 (including the March 30, 2009 changes) that summarizes each of these variances, and provides a brief basis for the variance taken in the proposed VCSNS Units 2 and 3 Security Plan revision. In addition to the variances specifically addressed in Enclosure 2, verb tenses have also been corrected throughout the document to agree with the singular/plural site-specific insertions for bracketed text.

For COLAs, the Power Reactor Security Requirements Rule also includes new requirements to include, in the application: (1) a cyber security plan in accordance with the requirements of 10 CFR 73.54; and (2) a description and plans for implementation of the guidance and strategies intended to mitigate the loss of large areas of the plant due to explosions or fire, as required by 10 CFR 50.54(hh)(2), commonly referred to as the §52.80(d) submittal. The submittal of these two elements of the application has been delayed due to delays in issuance of related regulatory guidance and issues associated with the development, review, and endorsement of the templates that are expected to provide an acceptable format and content for these elements. Changes to the VCSNS Units 2 and 3 COLA related to the Cyber Security Plan and the §52.80(d) submittal will be submitted for NRC review shortly after the industry templates for these elements are available. SCE&G expects that the delay in submittal of these elements will not impact the review schedule for the remainder of the application.

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

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

Executed on this 2nd day of April, 2009.

Sincerely,



Ronald B. Clary
General Manager
New Nuclear Deployment

JH/RC/jh

- Enclosures:
1. V. C. Summer Nuclear Station (VCSNS) Units 2 and 3 Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, Proposed Revision 1 -- **SAFEGUARDS INFORMATION**
 2. Errata: Variances from Generic Guidance Provided by March 18, 2009 Version of NEI 03-12, Rev. 6

cc (w/o enclosure):

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