



May 14, 2009  
NND-09-0132

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. 039

References: Letter from Brian Anderson (NRC) to Alfred M. Paglia (SCE&G), Request for Additional Information Letter No. 039 Related to SRP Section 13.1.1 for the Virgil C. Summer Nuclear Station Units 2 and 3 Combined License Application, dated March 27, 2009.

Letter from Ronald B. Clary (SCE&G) to Document Control Desk (NRC), Endorsement of Bellefonte R-COLA Standard Content Request for Additional Information, dated May 12, 2009 (NND-09-0129).

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 14<sup>th</sup> day of May, 2009.

Sincerely,

Ronald B. Clary  
General Manager  
New Nuclear Deployment

MLS/RBC/jf

DOB  
NFO

Enclosure

c:

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**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-1**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.1.B.iii states that the applicant discuss the development of the plant maintenance programs. FSAR section 13.1 does not appear to include a description of the development of the plant maintenance programs.

Please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

FSAR Section 13.5 discusses the development of maintenance procedures that will comprise the VCSNS maintenance programs. Plant maintenance programs are developed by maintenance, engineering, and work control department personnel to provide programs that ensure equipment operability and reliability. These programs are developed and made effective during the preoperation/startup phase with approved administrative procedures such that as equipment is placed in service it will be monitored and maintained under approved maintenance programs.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-2**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.1.B.vi states that the applicant provide the estimated number of personnel to be assigned to each unit with responsibility for the project design, construction and preoperation. FSAR section 13.1 does not appear to include the estimated number of personnel to be assigned to each unit with responsibility for the project design, construction and preoperation.

Please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

SCE&G performs oversight of design and construction activities and will support the preoperational test activities as discussed in FSAR Section 14.2, as updated by applicable standard RAI responses endorsed by SCE&G in letter NND-09-0129, dated May 12, 2009. Specific numbers of individuals providing oversight are not provided as noted in FSAR Table 1.9-202.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-3**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.1.B.vii states that the applicant provide the general educational and experience requirements for those personnel with design, construction and preoperation responsibilities. FSAR section 13.1 does not appear to include the general educational and experience requirements for those personnel with design, construction and preoperation responsibilities.

Please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

As discussed in FSAR Sections 13.1.1.4 and 13.1.3.1, education and experience requirements for station personnel are defined by Regulatory Guide 1.8 which endorses ANSI/ANS-3.1 with certain additions and exceptions. For positions listed in FSAR Table 13.1-201 that do not have a direct cross-reference section in ANSI/ANS-3.1, the most comparable ANSI/ANS-3.1 section will be used for guidance in establishing experience and education requirements.

Qualification requirements for personnel of the plant test and operation (PT&O) organization involved in preoperation and startup testing programs are addressed in FSAR Subsection 14.2.2.2, PT&O Organization Personnel Qualifications and Training, as updated by applicable standard RAI responses endorsed by SCE&G in letter NND-09-0129 dated May 12, 2009.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-4**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.1.B.ix states that the applicant provide the education and experience requirements for management and supervisory positions for design, construction and preoperation. FSAR section 13.1 does not appear to include the education and experience requirements for management and supervisory positions for design, construction and preoperation.

Please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

As discussed in FSAR Sections 13.1.1.4 and 13.1.3.1, education and experience requirements for station personnel are defined by Regulatory Guide 1.8 which endorses ANSI/ANS-3.1 with certain additions and exceptions. For positions listed in FSAR Table 13.1-201 that do not have a direct cross-reference section in ANSI/ANS-3.1, the most comparable ANSI/ANS-3.1 section will be used for guidance in establishing experience and education requirements.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-5**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.1.B.xi states that applicant provide the design, construction and preoperation positions that have functional responsibilities other than for the COL application, and the expected proportion of time assigned to the other activities. FSAR section 13.1 does not appear to include those design, construction and preoperation positions that have functional responsibilities other than for the COL application, and the expected proportion of time assigned to the other activities.

Please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

FSAR Figure 13AA-201 illustrates the Construction Management Organization and includes positions identified that have functional responsibilities for design oversight, construction oversight, and preoperational testing support of VCSNS Units 2 and 3. No functional responsibilities other than those for VCSNS Units 2 and 3 have been identified for these personnel.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-6**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.2.B states that the applicant provide the relationship of the nuclear-oriented part of the organization to the rest of the corporate organization. FSAR section 13.1 does not appear to include the relationship of the nuclear-oriented part of the organization to the rest of the corporate organization.

Please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

As described in Part 1 of the COL Application, SCE&G is the principal subsidiary of SCANA Corporation, an energy-based holding company with headquarters in Columbia, South Carolina.

As shown in FSAR Figure 13.1-203, the Chief Nuclear Officer (Senior Vice President, Generation) reports directly to the President and Chief Operating Officer of SCE&G; who in turn reports directly to the Chief Executive Officer of SCANA Corporation.

The nuclear organization is independent from the non-nuclear portion of SCE&G and other entities within the corporate structure for purposes of plant operations and project development, although the nuclear organization does receive the benefit of certain services provided by non-nuclear corporate entities. Such services include legal counsel and supply chain services, among others.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None

**NRC RAI Letter No. 039 Dated March 27, 2009**

**SRP Section: 13.01.01 - Management and Technical Support Organization**

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000 Projects) (COLP)

**NRC RAI Number: 13.01.01-7**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.2.C states that the applicant provide the provisions for technical support for operations, give the approximate numbers of and provide educational and experience requirements for each identified position or class of positions providing technical support for plant operations, and include specific educational and experience requirements for individuals holding the management and supervisory positions in organizational units providing support in the areas identified as items I.2.E – I.2.P

Section 13.1.1.2 of the application makes the statement "Table 13.1-201 shows the estimated number of positions required for each function." FSAR section 13.1 does not appear to include the provisions for technical support for operations, does not give the approximate numbers of and provide educational and experience requirements for each identified position or class of positions providing technical support for plant operations, nor does it include specific educational and experience requirements for individuals holding the management and supervisory positions in organizational units providing support in the areas identified as items I.2.E – I.2.P.

Regarding numbers of personnel as discussed in SRP Sections I.2.E, I.2.H, I.2.M, and I.2.P, please identify the location of this information in the VC Summer application, or justify its exclusion.

Regarding educational and experience requirements for managers, supervisors, and individuals holding the management and supervisory positions in organizational units providing support as discussed in SRP Sections I.2.E, I.2.H, I.2.M, and I.2.P, please identify the location of this information in the VC Summer application, or justify its exclusion.

**VCSNS RESPONSE:**

As discussed in FSAR Sections 13.1.1.4 and 13.1.3.1, education and experience requirements for station personnel are defined by Regulatory Guide 1.8 which endorses ANSI/ANS-3.1 with certain additions and exceptions. For positions listed in FSAR Table 13.1-201 that do not have a direct cross-reference section in ANSI/ANS-3.1, the most comparable ANSI/ANS-3.1 section will be used for guidance in establishing experience and education requirements.

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Organizations with responsibility for the project are illustrated by FSAR Figure 13AA-201 and include VCSNS staff that has design, construction, and preoperational responsibilities. FSAR Table 13.1-201 provides estimates for the number of station personnel filling positions identified as part of the station organization. Specific numbers of individuals providing oversight are not provided as noted in FSAR Table 1.9-202.

This response is PLANT SPECIFIC.

**ASSOCIATED VCSNS COLA REVISIONS:**

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

**ASSOCIATED ATTACHMENTS:**

None