



July 2, 2009
NND-09-0177

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 Supplemental Response to NRC Request for Additional Information (RAI) Letter No. 011

- References:
1. Letter from Manny Comar (NRC) to Alfred M. Paglia (SCE&G), Request for Additional Information Letter No. 011 Related to SRP Section 17.1 for the Virgil C. Summer Nuclear Station Units 2 and 3 Combined License Application, dated December 31, 2008.
 2. Letter from Ronald B. Clary (SCE&G) to Document Control Desk (NRC) Response to NRC Request for Additional Information (RAI) Letter No. 011, dated February 2, 2009.

The enclosure to this letter provides the supplemental South Carolina Electric & Gas Company (SCE&G) response to the RAI item 17.01-1 included in the above referenced letter. The enclosure also identifies associated changes that will be incorporated in a future revision of the VCSNS Units 2 and 3 COLA. The associated changes identified in the enclosure include changes associated with Reference 2.

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 2nd day of July, 2009.

Sincerely,

Ronald B. Clary
General Manager
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DO83
NRD

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JEB/RBC/jg

Enclosure

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NRC RAI Letter No. 011 Dated December 31, 2008

SRP Section: 17.1 – Quality Assurance During the Design and Construction Phases

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

NRC RAI Number: 17.01-1

Section 17.1 of the V.C. Summer FSAR states, in part, that, "NuStart maintains oversight for those activities performed as part of its COL application contract and SCE&G exercises oversight through their NuStart participation..." The staff requests the applicant to describe in detail, NuStart's scope of work related to V. C. Summer combined license application (COLA) development activities and to identify the specific provisions in V. C. Summer's quality assurance program that govern such development activities.

VCSNS RESPONSE:

COLA Part 2 (FSAR), Section 17.1 (Quality Assurance During the Design and Construction Phases), will be revised to include a better description of NuStart's scope of work utilized in the VCSNS COLA. These changes will be incorporated in a future revision of the VCSNS Units 2 and 3 FSAR.

This response is PLANT SPECIFIC.

ASSOCIATED VCSNS COLA REVISIONS:

COLA Part 2, FSAR Section 17.1 will be revised to read:

South Carolina Electric & Gas (SCE&G) is responsible for the establishment and execution of quality assurance program requirements during the design and construction phases of V.C. Summer Nuclear ~~Plant~~ Station Units 2 & 3. SCE&G may delegate and has delegated to others, such as NuStart Energy Development, LLC, Westinghouse Electric Company, and Bechtel Power Corporation, the work of establishing and executing the quality assurance program, or any parts thereof, but retains responsibility for the quality assurance program.

Effective during COL application development, through and until COL issuance, the NuStart Energy Development, LLC (NuStart) Quality Assurance ~~(QA)~~ Plan (Reference 201), ~~along with~~ the Westinghouse Electric Company Quality Management System (DCD Section 17.6) and Bechtel Power Corporation Nuclear Quality Assurance Manual (Reference 205) define the QA program requirements for design activities. Safety-related ~~C~~onstruction activities at SCE&G are not planned before the COL is issued.

NuStart was created by multiple utilities and, as such, is comprised of multiple member utilities to include SCE&G. NuStart's purpose is two-fold of which the first is a part for the purpose of demonstrating the licensing process defined by 10 CFR Part 52. NuStart consists of multiple utilities including SCE&G. The second purpose is to work with reactor vendors in completing the engineering work for the standardized plant designs.

Bechtel Power Corporation was contracted by SCE&G to develop the V.C. Summer Nuclear Station Units 2 & 3 COL application, ~~including site characterization activities~~. This included ~~the process of collection, review and analysis of specific data for site characterization and was performed controlled~~ under the Bechtel Power Corporation Quality Assurance Manual (Reference 205). ~~Bechtel Power Corporation maintains oversight of the activities performed under the COL application contract.~~

SCE&G maintains oversight of the COL application development as well as design and construction activities under its existing 10 CFR Part 50, Appendix B, program, as described in SCE&G "New Nuclear Deployment Quality Assurance Plan" (Reference 204) and the NRC approved SCE&G V.C. Summer Nuclear Station Unit 1 "Operational Quality Assurance Plan" (Reference 206). The "Operational Quality Assurance Plan" (Reference 206) is supplemented, in part, by the SCE&G "New Nuclear Deployment Quality Assurance Plan" (Reference 204). The "New Nuclear Deployment Quality Assurance Plan" (Reference 204) serves as an interfacing document between the work activities of the New Nuclear Deployment organization and the "Operational Quality Assurance Plan" (Reference 206). It assures that proper administrative controls and the quality of activities related to the procurement of services, equipment, oversight of construction/manufacturing, and licensing activities being performed within the New Nuclear Deployment organization conform to the applicable requirements of 10CFR50, Appendix B. These plans provide the necessary QA-quality assurance guidance meeting the requirements of 10 CFR Part 50 Appendix B and for oversight of safety-related site characterization activities and COL application content providers. SCE&G maintains this oversight of COL application development through the review and approval of the the NuStart Quality Assurance Plan (Reference 201), and industry standard COL application sections as well as conducting QA audits and/surveillances of NuStart and Bechtel activities, and providing input to the COL application development, including, but not limited to, review of COL application content.

Implementation of the applicable portions of the "Quality Assurance Program Description" (QAPD) discussed in Section 17.5 begins at COL issuance. The program establishes the QA-quality assurance program requirements for the remaining portion of the design and construction phases and for operations; full implementation of the operations related requirements will be no later than as indicated in FSAR Table 13.4-201.

COLA Part 2, FSAR Section 17.8, References 204 through 206 will be revised to read:

- 204. South Carolina Electric & Gas, "New Nuclear Deployment Quality Assurance Plan," ~~current applicable revision~~ Rev. 2, June 4, 2009.
- 205. Bechtel Power Corporation, "Nuclear Quality Assurance Manual," Rev.4, 11/01/02.
- 206 South Carolina Electric & Gas, V.C. Summer Nuclear Station Unit 1 "Operational Quality Assurance Plan," ~~current applicable revision~~ Rev. 27, February 21, 2005.