



September 16, 2009  
RC-09-0108

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NPF-12  
RESPONSE TO NRC QUESTIONS ON REQUEST FOR EXTENSION  
OF ENFORCEMENT DISCRETION AND REVISED SUBMITTAL  
SCHEDULE FOR 10 CFR 50.48(c) LICENSE AMENDMENT REQUEST  
(LAR 08-03929)

Reference: Jeffrey B. Archie, SCE&G, Letter (RC-09-0084) to Document Control  
Desk, USNRC, dated July 16, 2009, "Request for Extension of  
Enforcement Discretion and Revised Submittal Schedule for 10 CFR  
50.48(c) License Amendment Request (LAR 08-03929)

South Carolina Electric & Gas Company (SCE&G) per the referenced letter requested an extension of enforcement discretion and license amendment submittal for the fire protection program during transition to NFPA 805. As a result of the review of this request, the NRC has two questions which require additional information. These questions were discussed in a telephone call on September 3, 2009 between the NRC staff and SCE&G. The following provides SCE&G response to these questions.

#### **NRC Question 1**

The ED extension requires that manual actions that are used as compensatory measures must be evaluated for feasibility and reliability and the evaluation documented and maintained on site. In their letter, Summer states that this evaluation will be done in the future. Have they done the feasibility/reliability evaluation for currently existing manual actions used as compensatory measures?

#### **SCE&G Response**

VCSNS was licensed as a Self-Induced Station Black-Out (SISBO) plant which includes manual operator actions to implement the fire protection safe shutdown strategy.

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Manual operator actions associated with SISBO were evaluated for feasibility under IPEEE (Individual Plant Examination of External Events). The results of this IPEEE were submitted to the NRC on January 28, 1999 and are presently available on site for review. The station has also conducted additional evaluations to show that these manual actions are feasible and reliable. This information is also available on site. As discussed in the NFPA 805 Frequently Asked Question, FAQ 09-0057, the plant is eliminating SISBO as a safe shutdown strategy. Our goal with the transition to NFPA 805 is to significantly reduce manual operator actions.

**NRC Question 2**

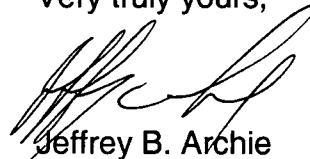
The ED extension requires that fire protection related noncompliances and the associated compensatory measures be documented and maintained on site. In their letter, Summer states that they will place any noncompliances and compensatory measures in the corrective action program, but does not address current noncompliances. Are the currently identified noncompliances and their compensatory measures in the corrective action program now?

**SCE&G Response**

Currently identified fire protection related noncompliances are addressed in the station's corrective action program. As discussed in the referenced letter, appropriate compensatory measures are initiated in accordance with the existing fire protection program.

If you have any questions regarding this response, please contact Mr. Bruce L. Thompson at (803) 931-5042.

Very truly yours,



Jeffrey B. Archie

GAR/JBA/jmg-dr

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