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Vice President
New Nuclear Deployment

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NND-09-0295

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. 012

Reference: 1) 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.
2) Letter from Ronald B. Clary (SCE&G) to Document Control Desk (NRC), Response to NRC Request for Additional Information Letter No. 012, dated February 2, 2009 (ML090360524).


The enclosure to this letter provides the South Carolina Electric & Gas Company (SCE&G) supplemental response to the RAI 17.5-6 included in the above referenced letter. For convenience, the response for RAI 17.5-6 provided with Reference 2 is repeated and the supplemental information is provided as green underlined text in the VCSNS Response section. 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.

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

Executed on this 1st day of December, 2009.

Sincerely,


Ronald B. Clary
Vice President
New Nuclear Deployment

DO 83
NND

JMG/RBC/jg

Enclosure

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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: 17.5-6

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. After COL issuance, the QA program will conform with Regulatory Guide 1.28, Revision 3 with one exception: quality assurance requirements will utilize the more

recently NRC endorsed NQA-1-1994 in lieu of the identified outdated standards. Appendix 1AA of the FSAR will be updated to indicate conformance with Regulatory Guide 1.28, Revision 0 up to COL issuance and conformance with Regulatory Guide 1.28, Revision 3 with the noted exception after COL issuance.

This response is PLANT SPECIFIC.

ASSOCIATED VCSNS COLA REVISIONS:

COLA Part 2, Appendix 1AA, Regulatory Guide 1.28 entry will be revised from:

VCS COL 1.9-1

Regulatory Guide 1.28, Rev. 0, 6/72 – Quality Assurance Program Requirements (Design 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 (Regulatory Guide 1.28, Rev. 0). 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.

to read:

VCS COL 1.9-1

Regulatory Guide 1.28, Rev. 0, 6/72 – Quality Assurance Program Requirements (Design 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 (Regulatory Guide 1.28, Rev. 0). 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.

Regulatory Guide 1.28, Rev. 3, 8/85 – Quality Assurance Program Requirements (Design and Construction)

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

<u>General</u>	<u>Exception</u>	<u>Quality assurance requirements utilize the more recently NRC endorsed NQA-1-1994 in lieu of the identified outdated standards.</u>
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ASSOCIATED ATTACHMENTS:

None