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February 25, 2010  
NND-10-0067

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 Verbal Request for Information Related to Chapter 17  
of the VCSNS Final Safety Analysis Report (FSAR).

The enclosure to this letter provides the South Carolina Electric & Gas Company (SCE&G) response to the verbal requests for information detailed in Enclosure 1. 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. Alfred M. 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 25<sup>th</sup> day of February, 2010.

Sincerely,

Ronald B. Clary  
Vice President  
New Nuclear Deployment

JEF/RBC/jf

Enclosure

Q004  
D083  
NRO

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**Verbal Request for Information 17.1-VR**

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

**Questions:**

- a) Does V.C. Summer plan to submit a revised QAPD for Units 2 and 3 based on the NEI 06-14A Revision 7 template including a commitment to Regulatory Guide 1.33, Revision 2?
- b) The organizations responsible for Construction, Preoperational/Testing, and Operations must be fully described in Part II, Section 1 of the QAPD, including the organizational structure, functional responsibilities, and levels of authority and lines of communication for activities affecting quality.
- c) In response to RAI 17.5-7, the applicant stated that it has used its current QA program for V.C. Summer Unit 1 during its site characterization activities and COLA preparation and further stated that these site characterization activities have been conducted in accordance with applicable Regulatory Guides as discussed in FSAR Chapter 2. However, the applicant has not addressed in Appendix 1AA the current Unit 1 quality assurance program and its conformance to the applicable Regulatory Guides.

**VCSNS RESPONSE:**

- a) In a future COLA update, a revised QAPD (Part 13) for Units 2 and 3 will be provided based upon the NEI 06-14A, Revision 7 template. The revision will include conformance to Regulatory Guide 1.33, Revision 2.
- b) The V.C. Summer Units 2 and 3 construction, preoperational/testing, and operations organizations are described in the attached mark-up to Part II, Section 1 of the VCSNS QAPD (Attachment I). Organizational changes through October 16, 2009 have been included to be consistent with COLA Revision 2 which was submitted on January 28, 2010. Additionally, conforming changes for NEI 06-14A Revision 7 pertaining to Part II, Section 1 of the QAPD have been included for this section. For reviewing purposes, changes made to the QAPD are highlighted in red strikethrough text for deletions, and green underlined text for insertions.
- c) Prior to COL issuance, activities performed for V.C. Summer Units 2 and 3 are completed under the V.C. Summer Unit 1 QA program. After COL issuance, Units 2 and 3 will operate under the approved QAPD included in Part 13 of the VCSNS Units 2 and 3 COL Application. The Unit 1 QA program has been audited on two

separate occasions by the NRC for its adequacy for use for Units 2 and 3 pre-COL issuance activities (ML073100387 and ML091910321). Unit 1 regulatory guides applicable to Units 2 and 3 pre-COL activities are not listed in Appendix 1AA of the Units 2 and 3 FSAR as they will not apply after COL issuance occurs.

**ASSOCIATED VCSNS COLA REVISIONS:**

Draft Revision 2 to Part II, Section 1 of the VCSNS QAPD.

**ASSOCIATED ATTACHMENTS:**

VCSNS QAPD Part II, Section 1 - Draft Revision 2

## Attachment 1

### VCSNS QAPD Part II, Section 1

#### Draft Revision 2

Note: The attached document is 15 pages in length

## PART II QAPD DETAILS

### SECTION 1 ORGANIZATION

This Section describes the SCE&G organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes support/off-site and on-site functions for New Nuclear Deployment including interface responsibilities for multiple organizations that perform quality-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of the QAPD. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

SCE&G Manager, Quality Systems is responsible to size the Quality Assurance organization commensurate with the duties and responsibilities assigned.

The SCE&G New Nuclear Deployment (NND) organization is responsible for new nuclear plant licensing, engineering, procurement, construction, startup and operations development activities. There are several organizations within SCE&G which implement and support the QAPD. These organizations include, but are not limited to NND, V. C. Summer Nuclear Station Unit 1 Procurement Group, Engineering, Training, Security, Emergency Preparedness, and SCANA ~~Environmental~~ Corporate Services.

Engineering, Procurement and Construction services are provided to the SCE&G NND organization by two primary contractors in accordance with their QAPDs. These two contractors are Shaw Stone & Webster and Westinghouse.

The following sections describe the reporting relationships, functional responsibilities and authorities for organizations implementing and supporting the NND QA Program. The SCE&G Corporate Organization, NND Construction Management Organization, and the Operating Plant Management Organization are shown in Figures II.-1-1 ~~II~~ through Figure II.-1-32, respectively.

#### 1.1 SCE&G Corporate Management Organization

##### 1.1.1 SCANA Chief Executive Officer (CEO)

The Chief Executive Officer (CEO) has the ultimate responsibility for the safe and reliable operation of each nuclear unit owned and/or operated by SCE&G. The CEO is responsible for the overall direction and management of the corporation, and the execution of the company policies, activities, and affairs. The CEO is assisted by the Executive Vice President, Generation (EVPG), and other executive staff in the nuclear division of the corporation.

##### 1.1.2 SCE&G President & Chief Operating Officer (COO)

As delegated from the CEO, the President & Chief Operating Officer (COO) is responsible for the design, construction and operations of SCE&G's nuclear plants. The COO directs the ~~CNOEVPG, who in turn directs the Senior Vice President of Nuclear Operations and the Manager, New Nuclear Deployment (GMNND).~~

### **1.1.3 Executive Vice President, Generation (EVPG)**

The EVPG reports to the CEO through the COO. The EVPG serves as the Chief Nuclear Officer (CNO) and is responsible for electric generation, overall plant nuclear safety, and takes the measures needed to provide acceptable performance of the staff in operating, maintaining, and providing technical support to the nuclear site. The EVPG/CNO delegates authority and responsibility for the operation and support of the site through the SVPNO. It is the responsibility of the EVPG/CNO to provide guidance and direction such that safety-related activities, including engineering, construction, operations, operations support, maintenance, and planning, are performed following the guidelines of the quality assurance program. The EVPG/CNO is responsible for new nuclear plant licensing, design, and construction through the SVPNO.

### **1.1.4 Senior Vice President, Nuclear Operations (SVPNO)**

The SVPNO reports to the EVPG. The SVPNO is responsible for the safe operation of all current nuclear plant operations along with the design, licensing, and construction of new nuclear plants. The SVPNO delegates authority and responsibility for the operation and support of the operating nuclear plants through the VPNO. The SVPNO is responsible for new nuclear plant licensing, design, and construction via the VPNNND who maintains control of nuclear plant construction through construction completion.

### **1.1.5 Vice President, New Nuclear Deployment (VPNNND)**

The VPNNND reports to the SVPNO and directs the planning and development of the NND staff and organizational resources. The VPNNND is responsible for establishing and managing the Engineering, Procurement and Construction contract (EPC) for the development of new nuclear power plants.

### **1.1.6 Vice President, Nuclear Operations (VPNO)**

The Vice President, Nuclear Operations reports to the SVPNO and is responsible for the overall safe and efficient operation of the nuclear operating plant(s) and for the implementation of quality assurance requirements in the areas specified by the QAPD.

## **1.32 New Nuclear Deployment (NND)**

SCE&G, New Nuclear Deployment organization is responsible for new nuclear plant licensing, engineering, procurement, construction, quality assurance, startup and operational development activities for the V.C. Summer Units 2 and 3.

### **1.3.1 General Manager, New Nuclear Deployment (GMNND)**

~~The GMNND reports to the SCE&G Senior Vice President, Generation and is responsible for the administration of the NND QAPD. The GMNND also directs the planning and development of the NND staff and organization resources. The GMNND is also responsible for establishing and managing the Engineering, Procurement and Construction contract (EPC) for the development of new nuclear generation.~~

#### **1.2.1 NND Manager, Design Engineering**

The NND Manager, Design Engineering reports to the VPNND and is responsible for new nuclear plant engineering activities, including standardized plant engineering and site specific engineering activities. The NND Manager, Design Engineering is responsible for the implementation of the QAPD with regards to all new nuclear plant engineering activities.

#### **1.2.2 NND Manager, Construction**

The NND Manager, Construction reports to the VPNND and directs the Engineering, Procurement, and Construction (EPC) Contractor in all activities regarding the construction of new nuclear plants. The NND Manager, Construction is responsible for the effective implementation of the QAPD for all new nuclear plant construction activities.

#### **1.2.3 NND Manager, Nuclear Licensing**

The NND Manager, Nuclear Licensing reports to the VPNND and is responsible for all new nuclear power plant licensing activities, including COL application development and environmental permitting. The NND Manager, Nuclear licensing is responsible for the effective implementation of the QAPD for all new nuclear plant licensing activities.

#### **1.2.4 NND Manager, Quality Systems**

The NND Manager, Quality Systems reports to the VPNND for all Quality Assurance activities and is responsible for developing and maintaining the SCE&G QAPDs, evaluating compliance to the programs and managing the QA organization resources. The NND Manager, Quality Systems is also responsible for the development and verification of implementation of the QAPD described in this document. The NND Manager, Quality Systems is responsible for assuring compliance with regulatory requirements and procedures through audits and technical reviews; for monitoring organization processes to ensure conformance to commitments and licensing document requirements; for ensuring that vendors providing quality services, parts and materials to SCE&G are meeting the requirements of 10 CFR 50, Appendix B through Nuclear Procurement Issues Committee (NUPIC) or SCE&G vendor audits. The NND Manager, Quality Systems has sufficient independence from other NND priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas necessary regarding SCE&G's NND activities. The NND Manager, Quality Systems may make recommendations to the NND management regarding improving the quality of work processes. If the NND Manager, Quality Systems disagrees with any actions taken by the NND organization and is unable to obtain resolution, the NND Manager, Quality Systems shall inform the VPNND and bring the matter to the attention of the Executive Vice President, Generation who will determine the final disposition.

#### **1.2.5 NND Manager, Business & Financial Services**

Reporting to the VPNND, the NND Manager, Business & Financial Services is responsible for financial matters related to NND and new plant construction. When handling certain financial matters, the NND Manager, Business & Financial Services periodically interfaces with SCANA Corporate Services.

### **1.2.6 NND Manager, Nuclear Training**

The NND Manager, Nuclear Training reports to the VPNN and is responsible for the development and implementation of all training activities for new nuclear plants.

### **1.2.7 NND Manager, Plant Test & Operation (PT&O)**

The NND Manager, PT&O reports to the VPNN during construction. As the plant transitions into operations, the Manager, PT&O then reports General Manager, Nuclear Plant Operations (GMNPO). The Manager, PT&O is responsible for staffing the PT&O organization and managing the initial test program (ITP) including personnel, scheduling and contracts associated with the ITP. The Manager, PT&O is responsible for the effective implementation of the QAPD for all PT&O activities.

## **1.3 V.C. Summer Units 2 and 3 Operating Plant Management Organization**

At an appropriate time, SCE&G will implement an operating organization for V.C. Summer Units 2 & 3. The proposed organizational structure is shown in Figure II.1-3 and is discussed in the sections below. The operating organization is responsible for keeping the VPNO abreast of plant conditions and verifying that the day to day operations of the plant are conducted safely and in accordance with all administrative controls including the QAPD.

### **1.3.1 General Manager, Nuclear Plant Operations (GMNPO)**

The GMNPO reports to the VPNO, is responsible for overall safe operation of the plant, and has control over those onsite activities necessary for safe operation and maintenance of the plant including operations, maintenance and modification, and planning/outage management. Additionally, the GMNPO has overall responsibility for occupational and public radiation safety. The GMNPO is also referred to as the Plant Manager.

#### **1.3.1.1 Manager In Charge of Units 2 and 3 Operations**

The manager in charge of operations has overall responsibility for the day-to-day operation of the plant. The manager in charge of operations reports to the GMNPO and is assisted by the operations supervisor and operations support supervisor. The manager in charge of operations or the operations supervisor is SRO licensed.

#### **1.3.1.2 Manager In Charge of Units 2 and 3 Maintenance**

The manager in charge of plant maintenance is responsible for the performance of preventive and corrective maintenance and modification activities required to support operations, including compliance with applicable standards, codes, specifications, and procedures. The manager in charge of plant maintenance reports to the GMNPO and provides direction and guidance to the maintenance discipline supervisors and maintenance support staff.

#### **1.3.1.3 Manager In Charge of Units 2 and 3 Planning / Outage**

The manager in charge of planning/outage support reports to the GMNPO and is responsible for planning and scheduling refueling, maintenance, and forced outages as well as providing direction and guidance to staff members in establishing outage activities.

### **1.3.2 General Manager, Nuclear Support Services (GMNSS)**

The GMNSS reports to the VPNO and is responsible for support functions including training, chemistry, radiation protection, emergency preparedness, and licensing. The GMNSS delegates authority and responsibility through managers in charge of each of these support functions.

#### **1.3.2.1 Functional Manager In Charge of Nuclear Licensing**

The functional manager in charge of nuclear licensing reports to the GMNSS and is responsible for providing technical direction and administrative guidance to the licensing staff for licensing activities including: maintaining the licensing basis, monitoring industry issues, tracking commitments and answering generic letters, and probabilistic risk assessment studies. The functional manager in charge of nuclear licensing is also responsible for preparing the site for special NRC inspections, interfacing with NRC inspectors, and interpreting NRC regulations.

#### **1.3.2.2 Functional Manager In Charge of Nuclear Training**

The functional manager in charge of nuclear training supervises a staff of training supervisors who coordinate the development, preparation, and presentation of training programs for nuclear plant personnel and reports directly to the GMNSS. The functional manager in charge of nuclear training is responsible for training programs at the site required for the safe and proper operation and maintenance of the plant.

#### **1.3.2.3 Functional Manager In Charge of Emergency Services**

The functional manager in charge of emergency services reports to the GMNSS and is responsible for developing and implementing the plant emergency response plan with state and local agencies. The functional manager in charge of emergency services is also responsible for developing and planning emergency drills and interfacing with the NRC for all emergency reporting matters.

#### **1.3.2.4 Functional Manager In Charge of Chemistry / Environmental**

The functional manager in charge of chemistry and environmental is responsible for developing, implementing, directing, and coordinating the chemistry, radiochemistry, and non-radiological environmental monitoring programs. This area includes overall operation of the hot lab, cold lab, and non-radiological environmental monitoring. The functional manager in charge of chemistry is responsible for developing, administering, and implementing procedures and programs that provide for effective compliance with environmental regulations. The functional manager in charge of chemistry reports to the GMNSS and directs the chemistry supervisors and chemistry technicians as assigned.

#### **1.3.2.5 Functional Manager In Charge of Health Physics / Safety (RP)**

The functional manager in charge of health physics / safety (HPS) has the direct responsibility for providing adequate protection of the health and safety of personnel working at the plant and members of the public during activities covered within the scope and extent of the license. The functional manager in charge of HPS is responsible for establishing, implementing, and enforcing the RP program; providing RP input to facility design and work planning; and

supporting the plant emergency preparedness program and assigning emergency duties and responsibilities within the RP organization. The functional manager in charge of HPS reports to the GMNSS and is assisted by the supervisors in charge of RP.

### **1.3.3 General Manager, Engineering Services (GMES)**

The GMES is the onsite lead position for engineering and reports to the VPNO. The GMES is responsible for engineering activities related to the operation or maintenance of the plant and design change implementation support activities. The GMES directs functional managers responsible for plant support engineering, design engineering, and materials and procurement engineering.

#### **1.3.3.1 Functional Manager In Charge of Design Engineering**

The functional manager in charge of design engineering reports to the GMES and is responsible for resolving design issues, Onsite development of design-related change packages and plant modifications, implementing effective project management methods and procedures, including cost controls, for implementation of modifications and construction activities, managing contractors who may perform modification or construction activities, maintaining the configuration control program, and developing and maintaining accident analysis activities and programs.

#### **1.3.3.2 Functional Manager In Charge of Plant Support Engineering**

The functional manager in charge of plant support engineering reports to the GMES and supervises a technical staff of engineers and other engineering specialists and coordinates interfaces with other groups as necessary. The functional manager in charge of plant support engineering is responsible for providing direction and guidance to system engineers for monitoring the efficiency and proper operation of balance of plant and reactor systems, planning programs for improving equipment performance, reliability, or work practices; overseeing operational tests and analyzing the results; and maintaining engineering programs such as ISI/IST, valve testing, maintenance rule, piping erosion/corrosion, and equipment reliability.

#### **1.3.3.3 Functional Manager in Charge of Materials & Procurement Engineering (M&PE)**

The functional manager in charge of M&PE reports to the GMES and is responsible for all site purchasing activities. The functional manager in charge of M&PE is also responsible for providing sufficient and proper materials to support the needs of the plant and performing related activities including procedure development, procurement and materials storage, and supply system database management.

#### **1.3.3.4 Engineer in Charge of Fire Protection**

The engineer in charge of fire protection is responsible for the design, maintenance, surveillance, and quality assurance of plant fire protection features. The engineer in charge of fire protection oversees fire prevention activities including the fire brigade organization and training. The engineer in charge of fire protection reports to the GMES who has ultimate responsibility for the fire protection program of the plant.

#### **1.3.4 General Manager, Organizational Effectiveness (GMOE)**

The GMOE reports to the VPNO and is responsible for support functions including quality services, nuclear protection services (security), and organizational development and performance.

##### **1.3.4.1 Functional Manager In Charge of Organizational Development & Performance (OD&P)**

The responsibilities of the functional manager in charge of OD&P include establishing processes and procedures to facilitate identification and correction of conditions adverse to quality and implement corrective actions. The functional manager in charge of OD&P also manages the Operating Experience and Human Performance programs. The functional manager in charge of OD&P reports to the GMOE.

##### **1.3.4.2 Functional Manager In Charge of Quality Systems**

The functional manager in charge of quality systems reports to the GMOE. The functional manager in charge of quality systems directs the activities of the quality assurance (QA) and quality control (QC) organizations. The QA activities include maintaining the QAPD, coordinating the development of audit schedules, and supporting the general QA indoctrination and training for nuclear station personnel. The QC organization is responsible for inspection/testing activities to support plant operation, maintenance, and outages.

##### **1.3.4.3 Functional Manager In Charge of Nuclear Protection Services**

The functional manager in charge of nuclear protection services is responsible for the administration of the security program, the day-to-day supervision of the security guard force, and implementing and enforcing security directives, procedures, and instructions received from appropriate authorities. The functional manager in charge of nuclear protection services reports directly to the GMOE.

#### **1.3.5 Manager in Charge of Business and Financial Services (BFS)**

The manager in charge of site business is responsible for business and financial services and project management activities and reports to the VPNO.

### **1.4 — V. C. Summer Unit 1 Support Organizations**

#### **1.4.1 — General Manager, Engineering Services (GMES)**

The GMES is responsible for managing the Engineering and Procurement organizations at Unit 1. The Engineering Services organization is responsible for support of NND organization by providing engineering services using qualified personnel when necessary and the work is outside the EPC contract. The Procurement organization is responsible for providing services to support the procurement of material and outside services for Units 2 and 3 as necessary under the NND QAPD.

#### **1.4.2 — General Manager, Nuclear Support Services (GMNSS)**

~~The GMNSS is responsible for managing the Emergency Preparedness (EP) and Training organizations at Unit 1. The EP organization will support NND when necessary to meet regulatory requirements for construction and eventually operation of Units 2 and 3 under the NND QAPD. The Training organization will support NND by developing training instructors at Unit 1 that will eventually be responsible for instructional activities supporting Units 2 and 3.~~

#### **1.4.3 — General Manager, Organizational Effectiveness (GMOE)**

~~The GMOE is responsible for managing the Security and Quality Systems organizations at Unit 1. The Security organization will support NND when necessary to meet regulatory requirements for construction and eventually operations of Units 2 and 3 under the NND QAPD. The Quality Systems organization will also support NND when necessary to meet regulatory requirements for construction and eventually operation of Units 2 and 3 under the NND QAPD.~~

#### **1.4.4 — General Manager, Nuclear Plant Operations (GMNPO)**

~~The GNPO is responsible for managing the plant operating organizations at Unit 1. The operating organizations will support NND by developing operating and maintenance personnel at Unit 1 that will eventually support the operating and maintenance activities at Units 1 and 2 under the NND QAPD. The Planning/Outage organization will support NND when necessary to coordinate maintenance and operational activities that also impact Units 2 and 3.~~

### **1.54 Corporate Services**

The SCANA/SCE&G Corporate Services organizations are responsible for supporting the NND organization by performing activities related to accounting, safety and health, and environmental services where applicable. These organizations will serve the NND organization through a “dotted-line” report to NND managers.

#### **1.6 — Senior Vice President, Generation (SVPG) & Chief Nuclear Officer (CNO)**

~~The SVPG is the Chief Nuclear Officer (CNO) and is responsible for the safe, reliable, and efficient operation of SCE&G nuclear plant(s). The SVPG directs the Vice President, Nuclear Operations and the General Manager, New Nuclear Deployment. The Senior Vice President, Generation will support NND activities through the Vice President, Nuclear Operations, and the General Manager, New Nuclear Deployment. The Quality Assurance organization has direct access to the SVPG. The CNO reports to the President & COO.~~

##### **1.6.1 — Vice President, Nuclear Operations**

~~The Vice President, Nuclear Operations reports to the Senior Vice President, Generation and is responsible for the overall safe and efficient operation of the nuclear operating plant(s) and for the implementation of quality assurance requirements in the areas specified by the QAPD once the COL application has been approved and at least 30 days prior to initial fuel load.~~

~~For the purposes of this program, the description of the duties of the Vice President, Nuclear Operations and the staff will be limited to those site activities that support the New Nuclear Deployment. Unit 1 currently has its own QAPD and will continue to follow the requirements of that program until such time that the three units combine their QAPDs.~~

#### ~~1.6.1.1 — Site Project Organization~~

~~The Site Project Organization is responsible for operations and maintenance of the respective plant site. The Site Project Organization is responsible for operations quality inspection activities of operations on-site work, including any that support New Nuclear Deployment COL application development, as well as controlling interfaces between the operating units and any preconstruction or construction activities. The New Nuclear Deployment organization is the responsible Site Project Organization.~~

#### ~~1.6.2 — NND Quality Assurance~~

~~The SCE&G NND Quality Assurance Organization is responsible for independently planning and performing activities to verify the development and effective implementation of the SCE&G NND QAPD including but not limited to New Nuclear Deployment, engineering, licensing, document control, corrective action program and procurement that support new nuclear plant generation.~~

##### ~~1.6.2.1 — Manager, Quality Systems~~

~~The NND Manager, Quality Systems reports to the GMNND for all Quality Assurance activities and is responsible for developing and maintaining the SCE&G QAPDs, evaluating compliance to the programs and managing the QA organization resources. The NND Manager, Quality Systems is also responsible for the development and verification of implementation of the QAPD described in this document. The NND Manager, Quality Systems is responsible for assuring compliance with regulatory requirements and procedures through audits and technical reviews; for monitoring organization processes to ensure conformance to commitments and licensing document requirements; for ensuring that vendors providing quality services, parts and materials to SCE&G are meeting the requirements of 10 CFR 50, Appendix B through Nuclear Procurement Issues Committee (NUPIC) or SCE&G vendor audits. The NND Manager, Quality Systems has sufficient independence from other NND priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas necessary regarding SCE&G's NND activities. The NND Manager, Quality Systems may make recommendations to the NND management regarding improving the quality of work processes. If the NND Manager, Quality Systems disagrees with any actions taken by the NND organization and is unable to obtain resolution, the NND Manager, Quality Systems shall inform the GMNND and bring the matter to the attention of the Senior Vice President, Generation who will determine the final disposition.~~

#### **1.75 Westinghouse Electric Company, LLC NSSS Applicant for Certification or DC Holder — A/E**

Westinghouse Electric Company, LLC is the NSSS supplier for Units 2 and 3 and provides engineering services for plant design and licensing of Units 2 and 3. These engineering services for new nuclear generation include site specific engineering and design necessary to support development of COL applications, preconstruction and construction activities.

## **1.6 Engineering, Procurement and Construction (EPC) Contractor**

Westinghouse and Shaw Stone and Webster have formed a consortium ~~to support and will serve as the~~ eEngineering, pProcurement and Cconstruction contractor for the construction of the Units 2 and 3. AP1000 Nuclear Plants. The EPC Contractor organization is shown on Figure II.1-2. The EPC Consortium Project Director reports to the VPNND for all matters concerning the construction of the plants.

### **1.87 License Application**

Bechtel Power Corporation provides engineering services for the development of the COL application. These engineering services include site specific license engineering, and design activities necessary to support development of the COL application, and planning and support for preconstruction and construction of new nuclear generation.

### **1.98 Authority to Stop Work**

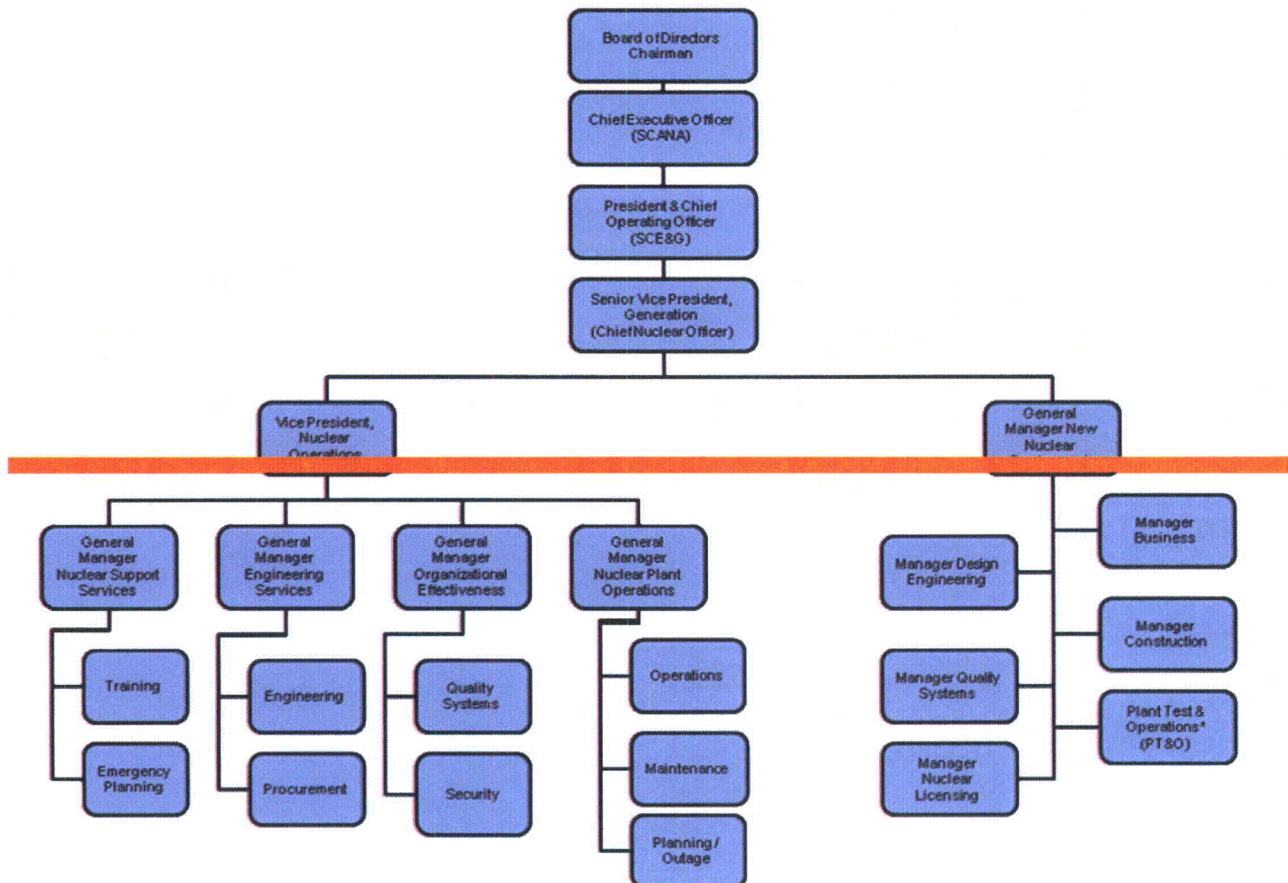
Quality assurance and inspection personnel have the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or SSC integrity may be jeopardized. This extends to off-site work performed by suppliers furnishing safety-related materials and services to SCE&G.

### **1.109 Quality Assurance Organizational Independence**

For the COL and construction, independence shall be maintained between the organization or organizations performing the checking (quality assurance and control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

### **1.1110 NQA-1-1994 Commitment**

In establishing its organizational structure, SCE&G commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.



\*During construction the functional manager, PT&O, reports to the GMNND. As the organization transitions into the operational phase the functional manager, PT&O reports to the Plant Manager.

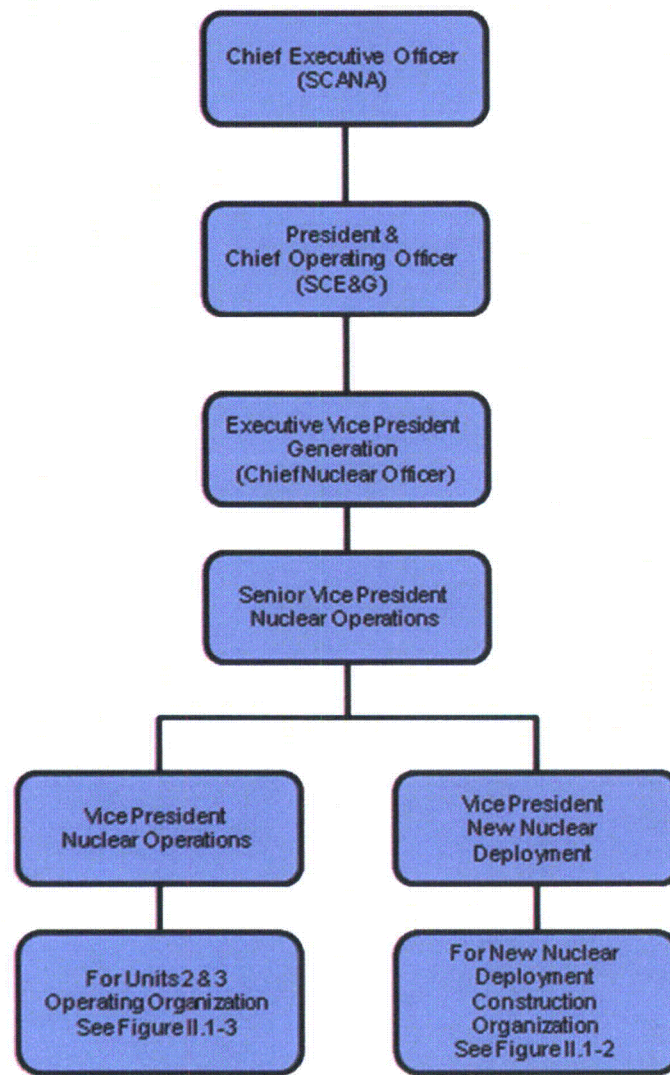
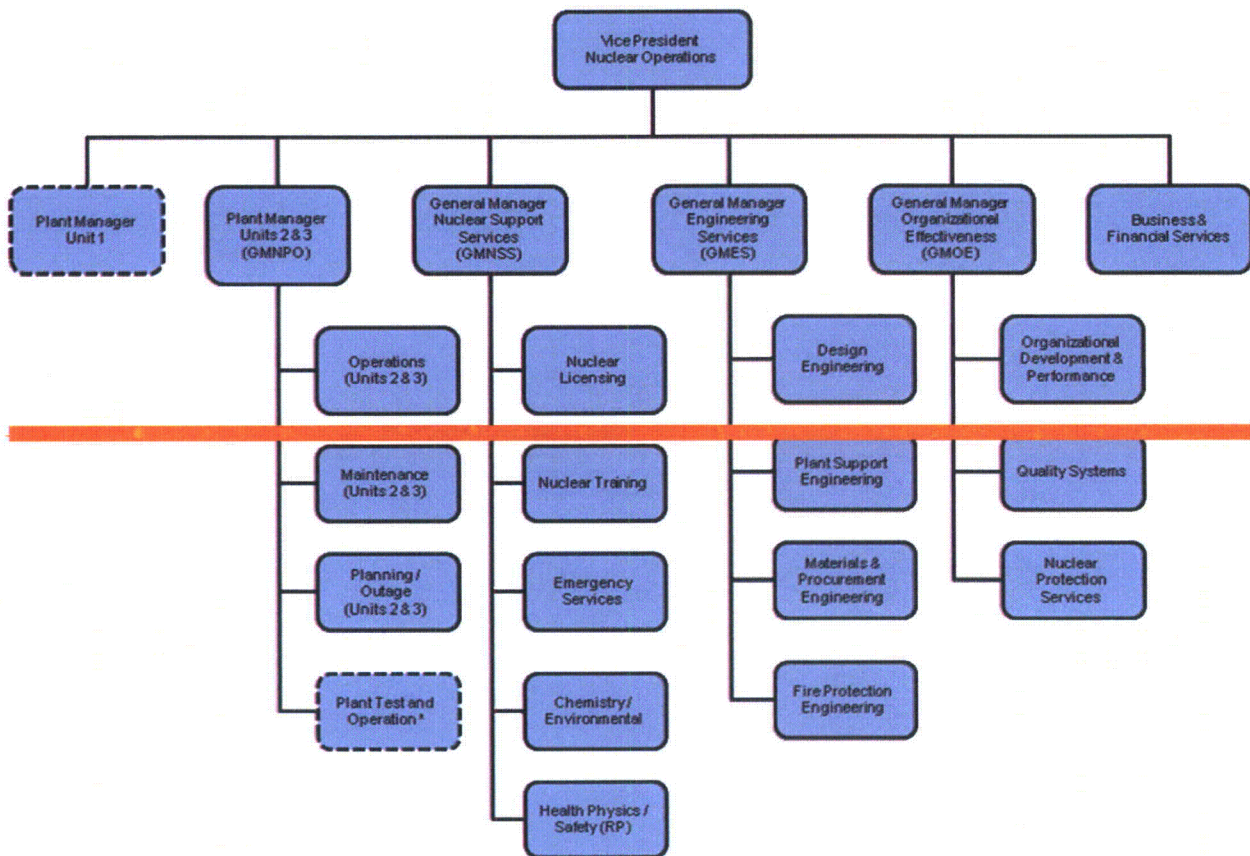
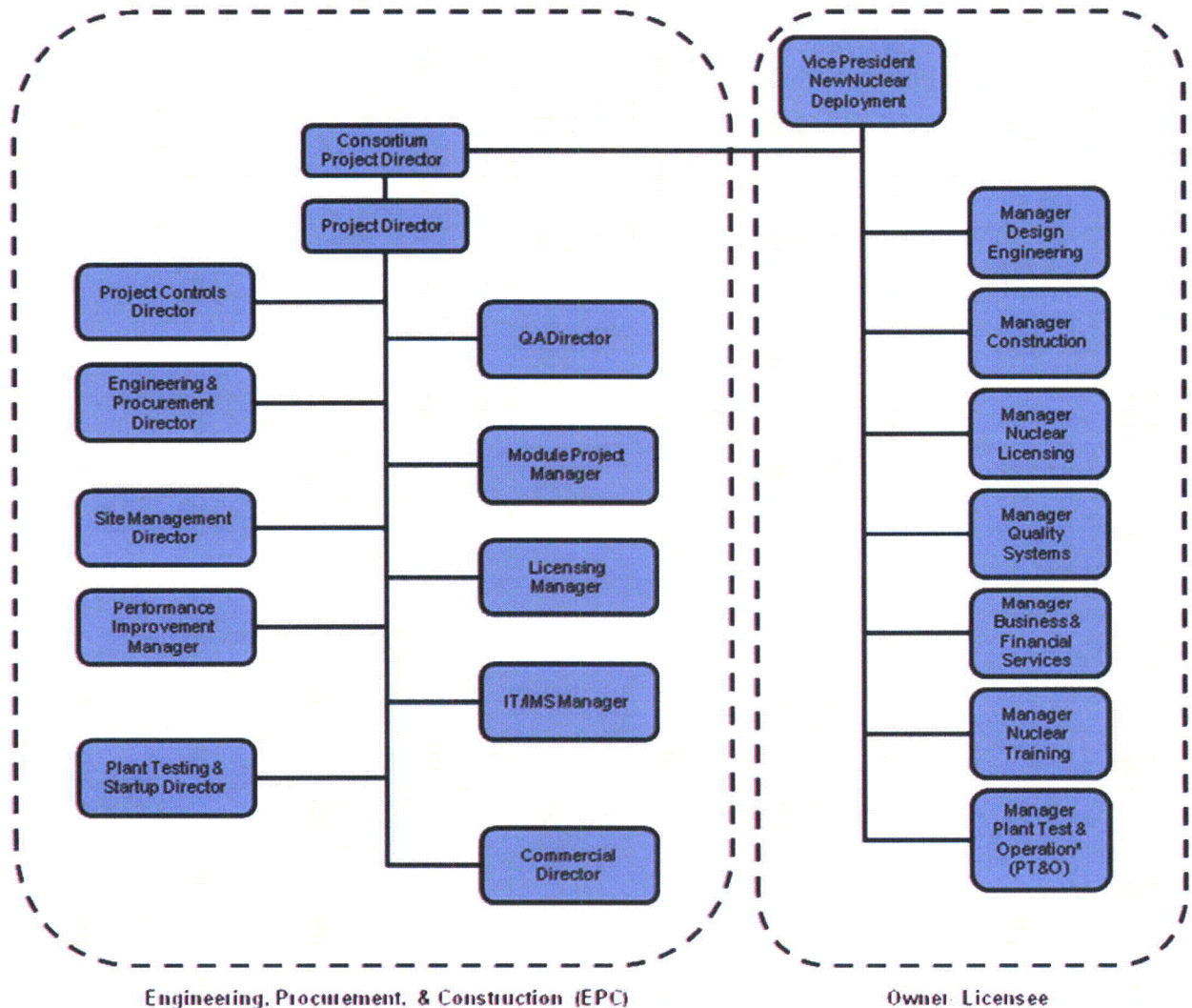


Figure II.1-1 - SCE&G Corporate Organization

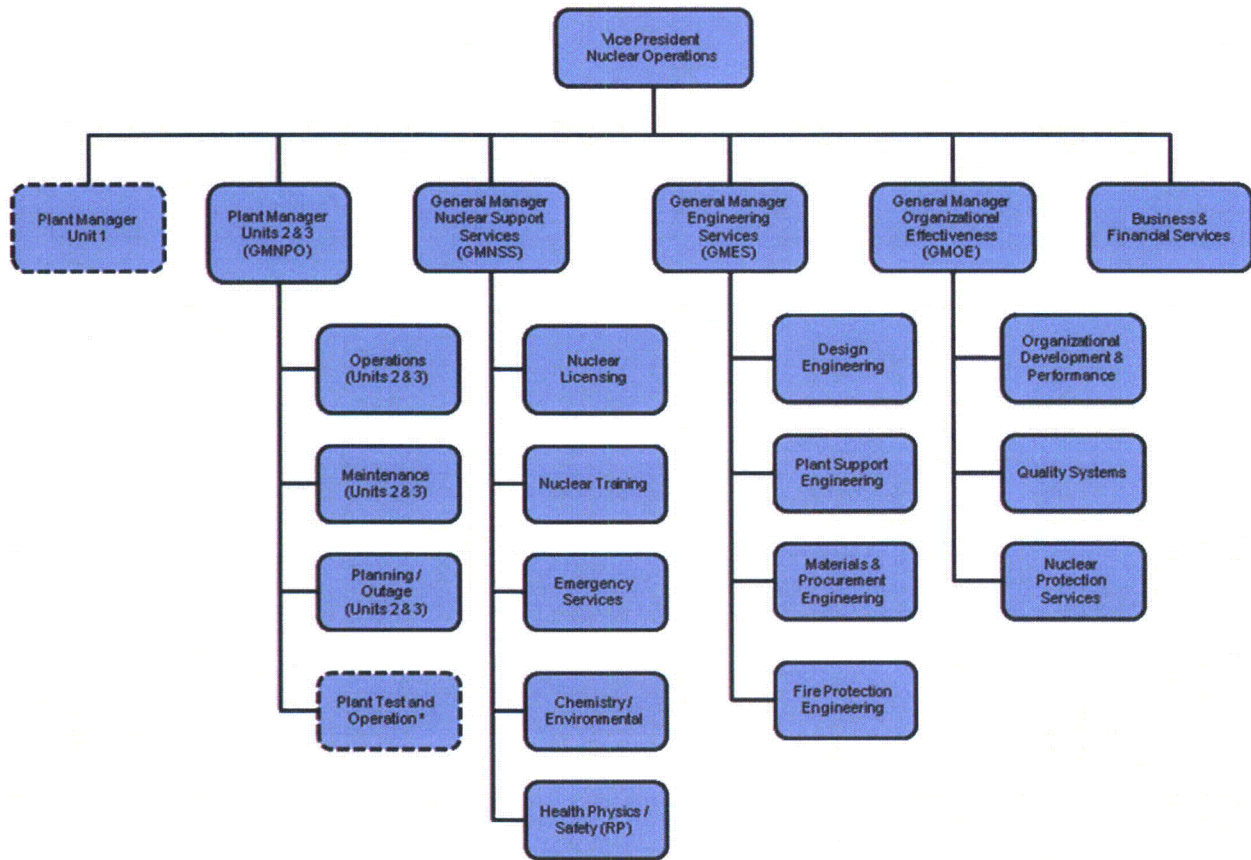


\*During construction the functional manager, PT&O, reports to the GMNND. As the organization transitions into the operational phase the functional manager, PT&O reports to the Plant Manager



\*During construction the functional manager, PT&O, reports to the VP NND. As the organization transitions into the operational phase the functional manager, PT&O reports to the Plant Manager.

Figure II.1-2 **Plant NND Construction Management Organization**



\*During construction the functional manager, PT&O, reports to the VPNND. As the organization transitions into the operational phase the functional manager, PT&O reports to the Plant Manager

**Figure II.1-3 Operating Plant Management Organization**