

SummerRAIsPEm Resource

From: McGovern, Denise
Sent: Tuesday, March 23, 2010 9:59 AM
To: SummerRAIsPEm Resource
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 078 RELATED TO SRP SECTION 13.3 FOR THE VIRGIL C. SUMMER NUCLEAR STATION UNITS 2 AND 3 COMBINED LICENSE APPLICATION
Attachments: SUM-RAI-LTR-078.docx

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Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 078 RELATED TO SRP SECTION 13.3 FOR THE VIRGIL C. SUMMER NUCLEAR STATION UNITS 2 AND 3 COMBINED LICENSE APPLICATION

Sent Date: 3/23/2010 9:59:20 AM
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From: McGovern, Denise

Created By: Denise.McGovern@nrc.gov

Recipients:
"SummerRAIsPEm Resource" <SummerRAIsPEm.Resource@nrc.gov>
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March 23, 2010

Mr. Alfred M Paglia
Manager, Nuclear Licensing
MC P40
South Carolina Electric & Gas Company
PO Box 88
Jenkinsville, SC 29065

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 078 RELATED TO
SRP SECTION 13.3 FOR THE VIRGIL C. SUMMER NUCLEAR STATION
UNITS 2 AND 3 COMBINED LICENSE APPLICATION

Dear Mr. Paglia:

By letter dated March 27, 2008, South Carolina Electric & Gas Company submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced passive pressurized water reactors pursuant to 10 CFR Part 52. The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, you may contact me at 301-415-0681 or you may contact Joe Sebrosky the lead project manager for the Virgil C. Summer Nuclear Station combined license at 301-415-1132.

Sincerely,

/RA/

Denise L. McGovern, Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-027
52-028

eRAI Tracking No. 4401

Enclosure:
Request for Additional Information

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-0681 or you may contact Joe Sebrosky the lead project manager for the Virgil C. Summer Nuclear Station combined license at 301-415-1132.

Sincerely,

/RA/

Denise L. McGovern, Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-027
52-028

eRAI Tracking No. 4401

Enclosure:
Request for Additional Information

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NRO-002

OFFICE	LIB/BC	NWE1/PM	NWE1/L-PM
NAME	*KWilliams	*DMcGovern	JSebrosky*
DATE	2/19/2010	2/19/2010	3/3/2010

*Approval captured electronically in the electronic RAI system.

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**Request for Additional Information
Virgil C. Summer Nuclear Station, Units 2 and 3
South Carolina Electric and Gas Company
Docket No. 52-027 and 52-028
SRP Section: 13.03 - Emergency Planning
Application Section: 13.3-2**

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

13.03-45

Subject: Exercise ITAAC
Regulatory Basis: 10 CFR 52.80(a)
NUREG-0800 SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

RAI 13.3-30(B)(3) requested additional information regarding exercise objectives and acceptance criteria.

In part, the response stated that the exercise objectives are provided in acceptance criteria 8.1.1. In addition, the response stated the acceptance criteria for the demonstration of each exercise objective will be provided in the procedures submitted in accordance with ITAAC Section 9.0 180 days prior to fuel load.

In Revision 2 of the VCSNS Emergency Plan, EP-ITAAC #8, "Exercises and Drills," Acceptance Criteria 8.1.1 identifies 12 exercise objectives; however, the associated acceptance criteria for each objective need to be included.

Provide Acceptance Criteria for each exercise objective in EP-ITAAC #8.

13.03-46

Subject: NRC Mobile Lab
Regulatory Basis: 10 CFR 50.47(b)(8)
NUREG-0800 SRP Acceptance Criteria: Requirement A; Acceptance Criterion 1

Section 2.H.7(c), "Laboratory Facilities," of the VCSNS Emergency Plan addresses using the NRC Mobile Lab for site area and general emergency situations. However, this capability no longer exists.

Revise the VCSNS Emergency Plan to remove this statement and discuss the compensation that will be provided to address the loss of this resource or justify why no compensation is warranted.

13.03-47

Subject: ERO Staffing
Regulatory Basis: 10 CFR 50.47(b)(8), Supplement 1 to NUREG 0737
NUREG-0800 SRP Acceptance Criteria: Requirement A; Acceptance Criterion 1

Section 2.H.5, "Activation," states VCSNS will use the unaffected unit on-shift personnel to augment the affected unit on-shift personnel upon declaration of an alert or higher classification. This staffing

augmentation will fulfill the NUREG-0654 Criterion II.B.5 for 30-minute responders and provides additional support to the on-shift ERO to permit a 75 minute response for on-call ERO personnel. The VCSNS Emergency Plan is written as if all 3 units were operational.

Clarify in the VCSNS Emergency Plan the specific staff or functions that will be provided by the unaffected unit to compensate for the lack of 30-minute responders.

13.03-48

Subject: Field Monitoring Teams

Regulatory Basis: 10 CFR 50.47(b)(9)

NUREG-0800 SRP Acceptance Criteria: Requirement A; Acceptance Criterion 1

Section 2.I.8, "Field Monitoring Teams," of the VCSNS Emergency Plan states the expertise necessary to conduct limited offsite environmental survey and sampling exist onsite 24 hours a day. A minimum of two offsite Field Monitoring Teams are notified and activated at an Alert or higher classification.

Discuss in greater detail what is meant by "limited." What needs to be available to be fully functional?

13.03-49

Subject: Contamination Control

Regulatory Basis: 10 CFR 50.47(b)(8)

NUREG-0800 SRP Acceptance Criteria: Requirement A; Acceptance Criterion 23

Section 2.K.6, "Contamination Control Measures," of the VCSNS emergency Plan states that contaminated personnel, equipment, and materials, will be decontaminated in accordance with procedures to "acceptable levels." In RAI 13.3-33(C)(1)(2), the NRC staff requested the definition of "acceptable limits." The response stated that decontamination procedures will be included in Implementing Procedures that will be developed according to Emergency Planning ITAAC Section 9.0. Action levels for decontamination personnel and equipment will be specified in plant procedures.

In review of Revision 2 of the proposed VCSNS Emergency Plan, it is not clear what procedures in the EPIP list will contain decontamination action levels. However, relative to Section 2.K.6.a, "Onsite Contamination Control," RAI 13.3-33(D) requested additional information on the contamination control criteria for returning areas and items to normal use. In response, the applicant stated that contamination control criteria for returning areas and items to normal use are identified in SCE&G VCSNS Procedures HPP-0158, "Contamination Control for Equipment and Materials;" and HPP-0160, "Control and Posting of Radiation Control Zones."

Revise Appendix 3 of the VCSNS Emergency Plan to include the EPIP for decontamination action levels or clarify whether the VCSNS procedures HPP-0158 and HPP-0160 will address these action levels.

13.03-50

Subject: Hostile Action Considerations

Regulatory Basis: 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1

Acceptance Criteria: 1, 2, and 30

Regulatory Guide 1.206 specifies that applicants for a combined license address the NRC orders issued February 25, 2002, as well as any subsequent NRC guidance, to determine what security-related aspects of emergency planning and preparedness are addressed in the emergency plan.

1. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance for identifying alternative facilities to support emergency response organization augmentation during hostile-action events.

Describe in the emergency plan, or provide reference to where this information is contained, an alternative facility to support rapid response to a hostile-action event, or provide justification as to why this information is not necessary. As stated in BL 2005-02, the alternative facility should include the following characteristics:

- Accessibility even if the site is under threat or attack;
- Communication links with the emergency operations facility, control room, and security;
- Capability to notify offsite response organizations if the emergency operations facility is not performing this action;
- Capability for engineering and damage control teams to begin planning mitigative actions (e.g., general drawings and system information)

2. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance regarding the potential effect on the plant from damage to nearby hazardous facilities, dams, and other nearby sites, however, the potential effect to onsite staffing with augmentation, and onsite evacuation strategies in consideration of a security event is not addressed. Clarify whether this evaluation has been performed and provide the location of where this evaluation has been considered in the VCSNS Emergency Plan. If this evaluation has not been performed, discuss the potential effect to onsite staffing with augmentation, and onsite evacuation strategies in consideration of a security event from damage to nearby hazardous facilities, dams, and other nearby sites.

Address this evaluation in the VCSNS Emergency Plan accordingly, or justify why this information is not required.

3. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance that Emergency Preparedness (EP) drills and exercise programs maintain the key skills necessary for mitigating security-based events. The Emergency Response Organization demonstrates security-based EP program activities under the schedule as committed to in their emergency plans.

Discuss in the emergency plan/procedures whether EP drills and exercises will be scheduled to address security based events or justify why this information is not required.