



RC-10-0070

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U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION GENERIC
LETTER 2008-01

- References:
1. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", dated January 11, 2008. (ML072910759)
 2. Virgil C. Summer Nuclear Station, Nine-Month Response to NRC Generic Letter 2008-01, dated October 13, 2008 from Jeffrey B. Archie to USNRC. (ML082890534)
 3. USNRC Letter dated March 25, 2010, to Mr. Thomas D. Gatlin, "Virgil C. Summer Nuclear Station Unit 1- Request for Additional Information - Generic Letter 2008-01, dated March 25, 2010. (TAC No. MD7883). (ML100810078)

In Reference 3 the NRC requested that South Carolina Electric & Gas Company (SCE&G) provide a response to a Request for Additional Information (RAI) related to the nine-month response, Reference 2, provided for Generic Letter 2008-01. This RAI requested a discussion of the training performed on managing gas accumulation in safety systems at VCSNS. Attachment I provides a response to this RAI. There are no Regulatory Commitments in this letter.

Should you have any questions, please call Bruce Thompson at (803) 931-5042.

I certify under penalty of perjury that the information contained herein is true and correct.

6-15-10
Executed on

Thomas D. Gatlin
Thomas D. Gatlin

GAR/TDG/jw
Attachment I

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CR-08-00162

RC-10-0070

Page 2 of 2

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Attachment I
Generic Letter 2008-01
Request for Additional Information (RAI)

RAI:

We are requesting additional information regarding whether SCE&G has acceptably demonstrated "that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational and testing control measures are in place for maintaining this compliance" as stated in GL 2008-01. Specifically, briefly discuss, consistent with Section 3.7 of the following reference, the training that is considered to be a necessary part of applying procedures and other activities when addressing the issues identified in the GL. The reference is the letter from William H. Ruland, "Preliminary Assessment of Responses to Generic Letter 2008-01," "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," and "Future NRC Staff Review Plans," to James H. Riley, Nuclear Energy Institute, ML091390637, May 28, 2009.

SCE&G Response:

The NRC GL did not require discussion of training to satisfy the 10 CFR 50.54(f) request and therefore none was provided in the VCSNS response. The referenced guidance was issued seven months after the VCSNS response was docketed. However, when any station procedure is modified, an assessment for training needs and change management is required in accordance with Station Administrative Procedure SAP-139, "Document Review and Approval Process". The determination is typically a function of the nature of the change and the perceived impact on the organization. If required, this training is generally accomplished prior to, or in parallel with the issuance of the procedure. For fill and vent procedure revisions, the changes have generally been minor and have been considered enhancements.

Training on gas accumulation and binding as addressed in INPO SOER 97-1, "Potential loss of High Pressure Injection and Charging Capability from Gas Intrusion," has been incorporated into Licensed Operator initial and requalification training. Training on this SOER is also provided to engineering personnel during engineering orientation training.

SCE&G is an active participant in the NEI Gas Accumulation Team, which has been coordinating with the Institute of Nuclear Power Operations (INPO) in the development of generic training modules for gas accumulation and management. Engineering, Operations, and Maintenance training modules have recently been completed. SCE&G will evaluate them for applicability to VCSNS and may implement a version tailored to meet station needs. A schedule for evaluation of these training modules has not yet been determined.