

Ronald B. Clary
Vice President
New Nuclear Deployment



July 1, 2010
NND-10-0255

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

Reference: Letter from Ronald B. Clary (SCE&G) to Document Control Desk (NRC), Response to NRC Verbal Request for Information Related to Chapter 17 of the VCSNS Final Safety Analysis Report (FSAR), dated May 24, 2010 (ML101470214).

In the above referenced letter, a response to a NRC verbal request for information was provided by SCE&G. Based on subsequent discussions with NRC staff, a revised response is provided in Enclosure 1 to this submittal. The only revision is in Item a) to correct a typographical error. Changes from the previous response are noted with red lined strike through text for deletions, and green underlined text for additions. The previously supplied draft QAPD is not being resubmitted with this letter.

Should you have any questions, please contact Mr. Alfred M. 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 July, 2010.

Sincerely,

Ronald B. Clary
Vice President
New Nuclear Deployment

JEF/RBC/jf

DOB3
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Enclosure

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Verbal Request for Information 17.1-VR

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

Questions from March 24, 2010 and April 22, 2010 Teleconferences:

- a) Does V.C. Summer plan to commit to Regulatory Guides 1.8 and 1.28 in the next revision of the VCSNS QAPD?
- b) Provide a new chart in Section I of the QAPD to show that the NND Organization is separate from the Construction Management Organization and explain why the size of the NND organization is different from that of other utilities.
- c) In Part II, Section 1.6 of the QAPD Draft Revision 2 of the QAPD provided in letter NND-10-0067, a description of the Engineering, Procurement and Construction Contractor was provided. Please provide additional detail regarding the roles and responsibilities of the EPC Contractor.
- d) In the next revision to the QAPD, will V.C. Summer incorporate the updated NEI 06-14 Revision 7 Template for QAPD Part III, Section 2: "Non-safety Related SSCs Credited for Regulatory Events"?
- e) Does V.C. Summer plan to endorse the standard content items in R-COLA letters ND-09-2082, dated December 31, 2009 and ND-10-0702 dated April 02, 2010.

VCSNS RESPONSE:

- a) As shown in FSAR Appendix 1AA, VCSNS commits to Regulatory Guide 1.8, Revision 03. In a future revision to the VCSNS QAPD, Part IV, Regulatory Commitments will be updated to provide a commitment statement to Regulatory Guide 1.8, Revision-03.

Prior to COL issuance, VCSNS commits to the Regulatory Guide 1.28, Revision 0. After COL issuance, VCSNS commits to Regulatory Guide 1.28, Revision 3. As provided in SCE&G letter NND-09-0295, dated December 1, 2009 (ML093380648), FSAR Appendix 1AA will be revised to include Regulatory Guide 1.28, Revision 3 for post COL issuance activities. In the next revision to the QAPD, Part IV, Regulatory Commitments will be updated to provide a commitment statement to Regulatory Guide 1.28, Revision 3.

- b) SCE&G's New Nuclear Deployment Organization oversees the design, licensing, and construction of SCE&G's new nuclear plants. Unlike other utilities that have a larger offsite corporate level nuclear development organization for licensing and

design of multiple plant locations, SCE&G has located all nuclear functions onsite with the New Nuclear Deployment construction oversight functions.

As requested during the March 24, 2010 teleconference, a new Figure II.1-2 "NND Management Organization" will be provided in a future revision to the QAPD. The positions represented on Figure II.1-2 are the same positions identified on the "Owner / Licensee" portion of Figure II.1-3 "NND Management Organization during Construction." These changes supplement RAI response 17.5-5 provided in SCE&G letter NND-09-0017, dated February 2, 2009 (ML090360524) and SCE&G Voluntary Response NND-10-0067, dated February 25, 2010 (ML100600365).

- c) Part 1, Section 1.6 - Engineering, Procurement and Construction (EPC) Contractor of the VCSNS QAPD will be revised to add additional details for the roles and responsibilities of the EPC Contractor. This change will revise the previously provided EPC Contractor description provided by SCE&G Letter NND-10-0067, dated February 25, 2010 (ML100600365).
- d) In a future revision to the QAPD, Part III, Section 2 "Non-safety Related SSCs Credited for Regulatory Events" of the QAPD will be revised to incorporate the NEI 06-14A, Revision 7 template changes.
- e) VCSNS endorses the standard content portions of R-COLA Letters ND-09-2082, dated December 31, 2009 (ML100081148) and ND-10-0702, dated April 02, 2010 (ML101090281). Letter ND-09-2082 incorporates the NEI 06-14 Revision 7 template and makes conforming changes to standard content FSAR sections for consistency. Conforming VCSNS QAPD changes to incorporate ND-09-2082 are included in the attached QAPD mark-up. Letter ND-10-0702 incorporates a reference to the QAPD within the FSAR. In a future revision to the VCSNS COLA, conforming FSAR changes to incorporate letters ND-09-2082 and ND-10-0702 will be provided.

ASSOCIATED VCSNS COLA REVISIONS:

VCSNS COLA, Part 13 QAPD revisions for parts a) through e) identified above are provided in the attached Draft Revision 2 of the VCSNS QAPD. Additional changes to incorporate the approved NEI 06-14, Revision 7 Template are also included. For reviewing purposes, right hand margin bars are provided to show which lines of text are changed. Text additions are provided in green-underline text and deletions are shown as red-strike through text. The final, approved QAPD with change bars will be provided in a future VCSNS COLA update.

ASSOCIATED ATTACHMENTS:

Draft Revision 2 of the VCSNS QAPD incorporating NEI 06-14 Revision 7 updates.