



August 11, 2010
NND-10-0304

U.S. Nuclear Regulatory Commission
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Subject: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Combined License Application (COLA) - Docket Numbers 52-027 and 52-028 Voluntary Response Related to Part 7 of the COLA.

Reference: 1. Letter from Southern Nuclear Operating Company to Nuclear Regulatory Commission (NRC), Voluntary Revision to Application Part 7 Involving Departure Reports, dated July 9, 2010 (ND-10-1229).

2. Letter from Westinghouse Electric Company to Nuclear Regulatory Commission (NRC), Response to NRC OI-TR107-NSIR-07, dated January 27, 2010 (DCP_NRC_002754).

In Reference Letter 1 above, a voluntary response was submitted by Southern Nuclear Operating Company to incorporate Westinghouse AP1000 Design Control Document (DCD) revisions that were provided in response to NRC OI-TR107-NSIR-07 (Reference 2). The response provided in Reference 1 was considered plant specific; however, SCE&G finds this response to be applicable to the VCSNS Units 2 and 3 COLA. The enclosure to this letter provides similar COLA revisions to incorporate DCD revisions shown in Reference 2.

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 11th day of August, 2010.

Sincerely,

Ronald B. Clary
Vice President
New Nuclear Deployment

D083
NRO

JMG/RBC/jg

Enclosure

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VCS DEP 18.08-01

Westinghouse recently responded to OI-TR107-NSIR-07 via letter DCP_NRC_002754, as submitted January 27, 2010. The response to the Design Control Document (DCD) RAI included a revision to DCD information related to the COL information item identified in DCD Subsection 18.8.3.5 on the technical support center (TSC). In particular, the subject letter revised DCD Subsection 18.8.3.5 to remove the Tier 2* designation from the information that identified the TSC as being in the control support area (CSA). This removal of the Tier 2* designation requires a revision to the Departure Report associated with VCS DEP 18.8-1 as shown in the COL Application Revisions Section below. These changes will be incorporated into a future VCSNS COLA revision.

This response is PLANT SPECIFIC.

ASSOCIATED VCSNS COLA REVISIONS:

1. COLA Part 7, Departures and Exemptions, Section A will be revised to delete the following paragraph:

~~Departure number VCS DEP 18.8-1 is a change to Tier 2* information in the DCD and prior NRC approval is required. The change is described and evaluated in the VCS Units 2 and 3 Part 5 (Emergency Plan).~~

2. COLA Part 7, Departures and Exemptions, Section A, Departure 18.8-1 will be revised as follows:

- a. Revise the Scope/Extent of Departure Section as follows:

This Tier 2* departure is identified in FSAR Subsections 12.5.2.2, 12.5.3.2, 18.8.3.5, and 18.8.3.6. Additionally, this Tier 2* departure is identified on FSAR Figures 1.2-201, 9A-201, 12.3-201, 12.3-202, and 12.3-203. These figures replace DCD Figures 1.2-18, 9A-3 (Sheet 1 of 3), 12.3-1 (Sheet 11 of 16), 12.3-2 (Sheet 11 of 15), and 12.3-3 (Sheet 11 of 16).

- b. Revise the Departure Evaluation Section as follows:

This Tier 2* departure is for a nonsafety-related system, and the alternate locations of the TSC and OSC meet applicable requirements. Relocating the TSC and OSC does not adversely affect their function and, therefore, this Departure does not:

1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD;

2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant specific DCD;
3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD;
4. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD;
5. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD;
6. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant specific DCD;
7. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD being exceeded or altered; or
8. Result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses.

This Tier 2* departure does not affect resolution of a severe accident issue identified in the plant-specific DCD.

Therefore, this departure has no safety significance.

~~Relocation of the TSC — This Tier 2* departure from DCD Subsection 18.8.3.5 requires prior NRC approval in accordance with 10 CFR 52 Appendix D, Section VIII.B.6.b. The details regarding the proposed TSC location and features are provided in Part 5 (Emergency Plan). Approval of the Tier 2* departure is requested as part of this COLA.~~

NRC Approval Requirement:

This departure does not require NRC approval pursuant to 10 CFR Part 52, Appendix D, Section VIII.B.5.

ASSOCIATED ATTACHMENTS:

None