Ronald B. Clary Vice President New Nuclear Deployment



August 24, 2010 NND-10-0312

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 Voluntary COLA Revisions Associated with Emergency Planning
- Reference: 1. Letter from Ronald B. Clary (SCE&G) to Document Control Desk (NRC), January 28, 2010 Submittal of the VCSNS COL Application, dated January 28, 2010.

SCE&G is providing a voluntary response to update FSAR Table 13.4-201, the Emergency Plan and Part 10 to provide more specificity in the Emergency Planning Inspections, Tests, Analysis, and Acceptance Criteria (ITAAC). The COLA changes identified in this response will be incorporated in a future COLA update.

Should you have any questions, please contact Mr. Alfred M. Paglia by telephone at (803) 345-4191, or by email at <u>apaglia@scana.com</u>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this $\frac{24}{4}^{+4}$ day of <u>August</u>, 2010.

Sincerely,

Rould B Clay

Ronald B. Clary Vice President New Nuclear Deployment

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c:

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Enclosure 1

VCSNS COLA Revisions

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1. VCSNS Part 10, Table 3.8-1, Emergency Planning ITAAC, Acceptance Criteria 1.1 will be revised in a future COLA update as follows:

1.1 The specified parameters <u>as listed in DCD Table 7.5-1 and FSAR Table 7.5-</u> <u>201</u> are retrievable in the Control Rooms, TSC and EOF, and the ranges of the displays encompass the values specified in the Emergency Classification and EAL Technical Basis Document.

2. VCSNS Part 10, Table 3.8-1, Emergency Planning ITAAC, Acceptance Criteria 5.1.5 will be revised in a future COLA update as follows:

5.1.5 The TSC has the means to receive, store, process, and display plant and environmental information <u>as listed in DCD Table 7.5-1 and FSAR Table 7.5-201</u>, and to initiate emergency measures and conduct emergency assessment.

3. VCSNS Part 10, Table 3.8-1, Emergency Planning ITAAC, Acceptance Criteria 5.2.4 will be revised in a future COLA update as follows:

5.2.4 Radiological data identified in the EP Unit Annex, meteorological data, and plant system data pertinent to determining offsite protective measures <u>as listed in</u> <u>DCD Table 7.5-1 and FSAR Table 7.5-201</u> are available and displayed when activated in the EOF.

4. VCSNS Part 10, Table 3.8-1, Emergency Planning ITAAC, Acceptance Criteria 8.1.3 will be revised in a future COLA update as follows:

8.1.3 The exercise was completed within the specified time periods of Appendix E to 10 CFR Part 50, offsite exercise objectives were met, and there were no uncorrected offsite exercise deficiencies, <u>or a license condition requires offsite</u> <u>deficiencies to be corrected prior to operation above 5% of rated power as</u> <u>described in 10 CFR 50.54(gg).</u>

5. VCSNS Part 5, Emergency Plan, Annex 2, Section 4.2 will be revised to add new paragraph as follows:

G. Emergency Response Data System (ERDS)

The Emergency Response Data System (ERDS) is supported via a data link to the NRC. In accordance with 10 CFR 50, Appendix E, Section VI, the appropriate variables listed in DCD Table 7.5-1 and FSAR Table 7.5-201 including plant equipment status and parameter information for reactor core and coolant system conditions, reactor containment conditions, radioactivity release conditions, and plant meteorological conditions will be transmitted as required.

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6. VCSNS Part 5, Emergency Plan, Annex 3, Section 4.2 will be revised to add new paragraph as follows:

G. Emergency Response Data System (ERDS)

The Emergency Response Data System (ERDS) is supported via a data link to the NRC. In accordance with 10 CFR 50, Appendix E, Section VI, the appropriate variables listed in DCD Table 7.5-1 and FSAR Table 7.5-201 including plant equipment status and parameter information for reactor core and coolant system conditions, reactor containment conditions, radioactivity release conditions, and plant meteorological conditions will be transmitted as required.

7. VCSNS Part 2, FSAR, Section 13.4, Table 13.4-201, Item 14 will be revised to add a new entry (with a left margin annotation of VCS SUP 13.4-1) as follows:

ltem		Program Title	Program Source (Required By)	FSAR Section	Implementation	
	em				Milestone	Requirement
	14	Emergency Planning	10 CFR 50.47; 10 CFR 50, Appendix E	13.3	Full participation exercise conducted within 2 years of scheduled date for initial loading of fuel.	10 CFR Part 50, Appendix E, Section IV.F.2.a(ii)
					Onsite exercise conducted within 1 year before the schedule date for initial loading of fuel	10 CFR Part 50, Appendix E, Section IV.F.2.a(ii)
					Applicant's detailed implementing procedures for its emergency plan submitted at least 180 days prior to scheduled date for initial loading of fuel	10 CFR Part 50, Appendix E, Section V
UP 13.4-1		Emergency Response Data System (ERDS) Implementation Program	<u>10 CFR 50,</u> Appendix E		Applicant's ERDS implementation program submitted at least 180 days prior to scheduled date for initial loading of fuel	<u>10 CFR Part 50,</u> Appendix E. Section VI.4.a