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Vice President  
New Nuclear Deployment

May 10, 2011  
NND-11-0154

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 Corrections Necessary to Accurately Reflect R-COLA Endorsement Letter

Reference: 1. Letter from Ronald B. Clary (SCE&G) to Document Control Desk (NRC), August 25, 2010 Endorsement of Vogtle R-COLA Stand Content Submittals (NND-10-0317).

In Reference 1 above, SCE&G endorsed Vogtle standard content provided to the NRC in a letter from SNC dated August 23, 2010 (ND-10-1608). Based on subsequent discussions with NRC staff, errors were identified as being made by SCE&G in incorporating the standard material into our subsequent COLA submittal. These errors are described in the attachment to this letter, and appropriate marked-up corrections to the VCSNS Units 2 and 3 Final Safety Analysis Report (FSAR) are provided. These corrections will be incorporated in the next revision (Revision 5) of the VCSNS Units 2 and 3 FSAR, included with the next COLA submittal.

Should you have any questions, please contact Mr. Alfred M. Paglia by telephone at (803) 345-4191, or by email at [apaglia@scana.com](mailto:apaglia@scana.com).

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

Executed on this 10<sup>th</sup> day of May, 2011.

Sincerely,

  
Ronald B. Clary  
Vice President  
New Nuclear Deployment

D083  
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# **Attachment 1**

## **VCSNS COLA Revisions**

In comparing the current revisions of the VCSNS Units 2 and 3 FSAR to the Vogtle Units 3 and 4 FSAR in Section 6.1.2.1.6, the following discrepancies are noted and summarized below:

Section 6.1.2.1.6 2<sup>nd</sup> Paragraph:

- 1<sup>st</sup> sentence, comma should be included after “phase”
- 2<sup>nd</sup> sentence, “coating” should read “coatings”

Section 6.1.2.1.6 3<sup>rd</sup> Paragraph:

- 2<sup>nd</sup> sentence, word “inspection,” is missing after “application,”
- 3<sup>rd</sup> sentence, “consolidated plant coating program” should be “consolidated plant coatings program”
- 3<sup>rd</sup> sentence, word “inspection” should be removed after “application,”

Section 6.1.2.1.6 4<sup>th</sup> Paragraph:

- 1<sup>st</sup> sentence, word “Coating” is missing from document title (Reference 202)

Section 6.1.2.1.6 8<sup>th</sup> Paragraph:

- 1<sup>st</sup> sentence, word and comma “application,” is missing

These discrepancies are the result of an administrative error that resulted in incorrectly incorporating material into the VCSNS Units 2 and 3 COLA. To correct the error, Revision 5 of the VCSNS Units 2 and 3 FSAR, Section 6.1.2.1.6, will be revised as shown below (Additions are in green and underlined; deletions are red and strikethrough.):

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6.1.2.1.6      Quality Assurance Features

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Replace the third paragraph under the subsection titled “Service Level I and Service Level III Coatings” within DCD Subsection 6.1.2.1.6 with the following information.

STD COL 6.1-2 During the design and construction phase, the coatings program associated with selection, procurement and application of safety related coatings is performed to applicable quality standards. The requirements for the coatings program are

contained in certified drawings and/or standards and specifications controlling the coating processes of the designer (Westinghouse) (these design documents will be available prior to the procurement and application of the coating material by the constructor of the plant). Regulatory Guide 1.54 and ASTM D5144 (Reference 201) form the basis for the coating program.

During the operations phase, the coatings program is administratively controlled in accordance with the quality assurance program implemented to satisfy 10 CFR Part 50, Appendix B, and 10 CFR Part 52 requirements. The coatings program provides direction for the procurement, application, inspection, and monitoring of safety related coating systems. Prior to initial fuel loading, a consolidated plant coatings program will be in place to address procurement, application, ~~inspection~~, and monitoring (maintenance) of those coating system(s) for the life of the plant.

Coating system monitoring requirements for the containment coating systems are based on ASTM D5163 (Reference 202), "Standard Guide for Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant," and ASTM D7167 (Reference 203), "Standard Guide for Establishing Procedures to Monitor the Performance of Safety-Related Coating Service Level III Lining Systems in an Operating Nuclear Power Plant." Any anomalies identified during coating inspection or monitoring are resolved in accordance with applicable quality assurance requirements.

Include a new second paragraph under the subsection titled "Service Level II Coatings" within DCD Subsection 6.1.2.1.6 with the following information.

Such Service Level II coatings used inside containment are procured to the same standards as Service Level I coatings with regard to radiation tolerance and performance under design basis accident conditions as discussed below.

Replace the second sentence of the third paragraph under the subsection titled "Service Level II Coatings" within DCD Subsection 6.1.2.1.6 with the following information.

Coating system application, inspection and monitoring requirements for the Service Level II coatings used inside containment will be performed in accordance with a program based on ASTM D5144 (Reference 201), "Standard Guide for Use of Protective Coating Standards in Nuclear Power Plants," and the guidance of ASTM D5163 (Reference 202), "Standard Guide for Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant." Any anomalies identified during coating inspection or monitoring are resolved in accordance with applicable quality requirements.

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In addition, in FSAR Section 3.9.6.2.2, a comma in the standard material that was removed by Vogtle letter ND-10-0393 was inadvertently not removed in the next VCSNS Units 2 and 3 FSAR update. To correct this error, Revision 5 of the VCSNS Units 2 and 3 FSAR, Section 3.9.6.2.2, will be revised to remove the comma after "required" in the last sentence as shown below:

- Periodic static testing is performed, at a minimum on high risk (high safety significance) valves, to identify potential degradation, unless those valves are periodically cycled during normal plant operation, under conditions that meet or exceed the worst case operating conditions within the licensing basis of the plant for the valve, which would provide adequate periodic demonstration of AOV capability. If required, based on valve qualification or operating experience, periodic dynamic testing is performed to re-verify the capability of the valve to perform its required functions.