



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 11, 2011

Mr. Thomas D. Gatlin
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88
Jenkinsville, SC 29065


**SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 (V.C. SUMMER) -
REQUEST FOR ADDITIONAL INFORMATION ON QUALITY ASSURANCE
PLAN (TAC NO. ME5899)**

Dear Mr. Gatlin:

By letter dated March 18, 2011 (Agencywide Documents Access and Management System Accession No. ML110810688), South Carolina Electric and Gas Company submitted a license amendment request for U.S. Nuclear Regulatory Commission (NRC) review that would relocate several requirements of the Technical Specification Section 6.0, "Administrative Controls," to the new V.C. Summer Quality Assurance Program Description. The NRC staff has determined that additional information is required as addressed in the enclosure. This topic was discussed with your staff on July 21, 2011.

We request that a response be provided within 30 days of the date of this letter.

Sincerely,


Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE LICENSE AMENDMENT REQUEST
TO CHANGE ADMINISTRATIVE CONTROLS
FOR THE QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)
FOR VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 (V.C. SUMMER)

QAPD Section 1.0 - ORGANIZATION

- 1.0.1 Standard Review Plan (SRP), Section 17.5, paragraph II.A.3., states in part that, "Quality Assurance Program description (QAPD) is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." Part I, Section 1, "General," of the V.C. Summer QAPD states in part that "SCE&G's [South Carolina Electric & Gas Company's] Operational Phase Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for operations activities conducted by or for SCE&G." Part II, Section 1, "Organization," discusses the several organizations within SCE&G Nuclear Operations that support New Nuclear Development through implementing and supporting the QAPD. Part I is not clear that it will support construction as stated in Part II. Provide clarification why Part I, Section 1, is not in alignment with the organizational description described under Part II, Section 1, "Organization," of the V.C. Summer QAPD.
- 1.0.2 SRP Section 17.5, paragraph II.A.3., states in part that, "Quality Assurance Program description (QAPD) is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." Part II, Section 1, Subsection 1.1.4, "Senior Vice President & Chief Nuclear Office (SVP/CNO)" states in part that, "The SVP/CNO is responsible for new nuclear plant licensing, design, and construction via the Vice President, New Nuclear Deployment (VPNND) who maintains control of nuclear plant construction through construction completion." Figure II.1-1, "SCE&G Corporate Organization," is used to represent the organizational structure described in Part II, Section 1, of the V.C. Summer QAPD. Part II, Section 1, Subsection 1.1, "SCE&G Corporate Management Organization," is not aligned with the organizational representation as illustrated by Figure II.1-1. The function of the VPNND is not included in the proposed revision of V.C. Summer QAPD. Provide a description of the functions of the VPNND.
- 1.0.3 SRP Section 17.5, paragraph II.A.3., states in part that, "Quality Assurance Program description (QAPD) is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." Part II, Section 1, Subsection 1.2.2.3, "Manager, Emergency Services," describes the function of the Manager under

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the V.C. Summer emergency preparedness program. Figure II.1-2, "Unit 1 Plant Management Organization," uses the term "Manager, Emergency Planner (Unit 1)." Provide clarification if there is any distinction between the terms "Manager, Emergency Services" and "Manager, Emergency Planner (Unit 1)."

- 1.0.4 SRP Section 17.5, paragraph II.A.5.c., states in part that, "the manager responsible for carrying out the audit functions needs to be able to report to a management level sufficiently high to ensure that cost and schedule consideration do not unduly influence decision making." Part II, Section 1, Subsection 1.2.4.3, "Manager, Quality Systems," states that, "The MQS [Manager, Quality Systems] through the GMOE [General Manager, Organizational Effectiveness] has the responsibility and authority to report quality matters to any management level necessary within SCE&G in order to establish timely and effective corrective action. The MQS is authorized by this QAPD to identify concerns adverse to quality directly to the VPNO [Vice President Nuclear Operations]." Subsection 1.2.4.3 states that the MQS has a direct line of communication to the VPNO to discuss quality-related issues. The direct line of communication between the MQS and the VPNO is not reflected in Figure II.1-2, "Unit 1 Plant Management Organization." Provide clarification in Figure II.1-2 of the location of the representation of the direct line of communication described in Subsection 1.2.4.3.
- 1.0.5 SRP Section 17.5, paragraph II.A.3., states in part that, "Quality Assurance Program description (QAPD) is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces." The organizational descriptions and functions under Part II, Section 1, specifically, Subsections 1.2.4.3, "Manager, Quality Systems," 1.3, "Quality Assurance," and 1.5, "Quality Assurance Organizational Independence," emphasizes that these functions will provide support to the operational phase of the V.C. Summer. The organizational description described under subsections 1.2.4.3, 1.3, and 1.5 are not in alignment with the organizational structure in Figure II.1-2, "Unit 1 Plant Management Organization." Provide clarification of the functional responsibilities under subsections 1.2.4.3, 1.3, and 1.5 to address support to new construction.

QAPD Section 3.0 – CONTROL OF MEASURING AND TEST EQUIPMENT

- 3.0.1 SRP Section 17.5, paragraph II.L.8., states that, "procurement of commercial-grade calibration services for safety-related applications, laboratory accreditation programs administered by the National Institute of Standards and Technology and by the American Association for Laboratory Accreditation, as recognized through the mutual recognition arrangement of the International Laboratory Accreditation Program (ILAC), are acceptable in lieu of a supplier audit, commercial-grade survey, or in-process surveillance provided that all of the conditions as listed from (a) through (i) under Section 17.5, paragraph II.L.8 of the SRP are met." Part II, Section 7, Subsection 7.2, "NQA-1-1994 Commitment/Exceptions," of the QAPD describes the exception and clarification that SCE&G proposed for the purchase of commercial calibration services from a calibration laboratory. The proposed exception described under Subsection 7.2 of the QAPD does not address two of the required provisions: "h. The alternative method is limited to the domestic calibration service suppliers" and "i. The alternative method is applicable to sub-suppliers of calibration service suppliers, provided the above

conditions are met.” Provide clarification as to whether SCE&G intends to implement this alternative consistent with Section 17.5, paragraph II.L.8., of the SRP.

QAPD Section 4.0 – RECORDS

- 4.0.1 SRP Section 17.5, paragraph II.Q.11., states in part that, “records are classified as Lifetime or Nonpermanent.” Lifetime records are those that meet one or more of the criteria listed under paragraph II.Q.11 of the SRP. In SCE&G’s letter of March 18, 2011, specifically Attachment VI, “Proposed Revisions to the FSAR,” Insert #1, SCE&G states in part that, “Virgil C. Summer Nuclear Station commits to Regulatory Guide (RG) Position C.2 and Table 1 only, along with NQA-1-1994 Basic Requirement 17 and Supplementary Requirement 17S-1 for quality assurance record types and retention requirements.” The QAPD, Part V, Section 2, Subsection 2.4, “Record Retention,” has a list of records that have been classified as Lifetime or Nonpermanent. The list provided for record retention under Subsection 2.4, is not consistent with the requirements of Table 1 of RG 1.28, “Quality Assurance Program Requirements (Design and Construction),” Revision 3. Provide clarification of the different types of records and their respective retention times.

QAPD Section 5.0 – QA PROGRAM COMMITMENTS

- 5.0.1 SRP Section 17.5, paragraph II.U.1. “Regulatory Guides (RGs) and Generic Letters (GLs),” states in part that, “all commitments should be listed. Exceptions or alternatives to the specific criteria in any of these RGs and GLs may be proposed by applicants or holders provided adequate justification is provided.” Part IV of the Nuclear Energy Institute (NEI) 06-14A, Revision 7, “Quality Assurance Program Description,” states that RG 1.33 describes a method acceptable to the Nuclear Regulatory Commission (NRC) staff for complying with the Commission’s regulations with regard to the overall QAP requirements for the operation phase of nuclear power plants. Provide clarification of why Part IV of the V.C. Summer QAPD deviates from the content as described in Part IV of NEI 06-14A Revision 7.

QAPD Section 6.0 – NONSAFETY-RELATED QUALITY CONTROLS

- 6.0.1 SRP Section 17.5, paragraph II.V.2.a., states that, “The applicant or holder commits to implement quality requirements to the fire protection system in accordance with Regulatory Position 1.7, “Quality Assurance,” in RG 1.189, “Fire Protection for Operating Nuclear Power Plants.” RG 1.189, Section 1.7, quality assurance states in part that, “The NRC staff generally used guidance for an acceptable QAP for fire protection systems, previously given in Section C.4 of BTP [Branch Technical Position] CMEB 9.5-1, Revision 2, in the review and acceptance of approved FPPs for plants licensed after January 1, 1979.” Provide clarification as to whether SCE&G intends to implement this requirement consistent with Section 17.5, paragraph II.V.2.a., of the SRP.

QAPD Section 7.0 – INDEPENDENT REVIEW

- 7.0.1 SRP Section 17.5, paragraph II.W.2.d., discusses reviews violations, deviations, and reportable events that are required to be reported to the NRC in writing within 24 hours. This review includes the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event. Part V, Section 2, Subsection 2.2, "Independent Review," item d, addresses reviews violations, deviations, and events that are required to be reported to the NRC. This review includes the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event. Item d does not address the time requirement to report in writing to the NRC any events as a result of the review of violations, deviations, and reportable by the Independent Review Board. Provide clarification as to whether SCE&G intends to implement this alternative consistent with Section 17.5, paragraphs II.W.2.d. of the SRP.

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* transmitted by memo dated 7/01/11

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