

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**BEFORE THE COMMISSION**

In the Matter of	)	
	)	Docket Nos. 52-027-COL
	)	52-028-COL
SOUTH CAROLINA ELECTRIC & GAS	)	
COMPANY AND SOUTH CAROLINA	)	
PUBLIC SERVICE AUTHORITY (ALSO	)	
REFERRED TO AS SANTEE COOPER)	)	
	)	
(Virgil C. Summer Nuclear Station Units 2	)	September 27, 2011
and 3)	)	
	)	

**SOUTH CAROLINA ELECTRIC & GAS COMPANY’S PRE-FILED DOCUMENTS  
FOR THE V.C. SUMMER UNITS 2 AND 3 MANDATORY HEARING**

Pursuant to the August 22, 2011 Hearing Notice,<sup>1</sup> South Carolina Electric & Gas Company (“SCE&G”) submits the following pre-filed documents to support the V.C. Summer Units 2 and 3 mandatory hearing.

**SCE&G List of Anticipated Witnesses**

As directed by the Hearing Notice,<sup>2</sup> Attachment 1 to this document provides SCE&G’s list of anticipated witnesses for the mandatory hearing. These anticipated witnesses include individuals who are providing pre-filed written testimony and individuals who support SCE&G’s answers to the Commission questions.

**SCE&G’s Answers to Commission Questions**

On September 15, 2011, the Commission issued an Order providing initial questions associated with the mandatory hearing for V.C. Summer Units 2 and 3, including some questions

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<sup>1</sup> South Carolina Public Service Authority (Also Referred to as Santee Cooper); Combined Licenses for Virgil C. Summer Nuclear Station, Units 2 and 3, 76 Fed. Reg. 53,492 (Aug. 26, 2011) (“Hearing Notice”).

<sup>2</sup> *Id.* at 53,493.

specifically directed to SCE&G.<sup>3</sup> As called for by the Hearing Notice and this Order, SCE&G provides its answers to the Commission's written questions that are directed to SCE&G as Exhibit VCS000001.

### **SCE&G's Pre-Filed Written Testimony**

As directed by the Hearing Notice,<sup>4</sup> SCE&G submits its pre-filed written testimony in support of the V.C. Summer Units 2 and 3 mandatory hearing as Exhibits VCS000002, VCS000003, and VCS000004. Exhibit VCS000002 is the written testimony of Stephen A. Byrne and Alfred M. Paglia, Jr., which provides an overview of the V.C. Summer Units 2 and 3 project and the corresponding combined license application ("COLA"). Exhibit VCS000003 is the written testimony of Amy M. Monroe, which addresses the safety aspects of the V.C. Summer Units 2 and 3 COLA. Exhibit VCS000004 is the written testimony of April R. Rice, which addresses the environmental aspects of the V.C. Summer Units 2 and 3 COLA.

### **SCE&G Exhibit List**

SCE&G also provides an exhibit list as Attachment 2 to this document. The exhibit list identifies the various exhibits, including the exhibit numbers, witness(es) sponsoring the exhibits, and a description of the exhibits.<sup>5</sup>

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<sup>3</sup> Order (Transmitting Pre-Hearing Questions) (Sept. 15, 2011) (unpublished).

<sup>4</sup> Hearing Notice at 53,493.

<sup>5</sup> In an attempt to minimize the need to re-file documents in this proceeding based on a future scheduling order, SCE&G has formatted its pre-filed documents and exhibits to conform to the relevant requirements of the Commission's September 13, 2011 Scheduling Order for the Vogtle Units 3 and 4 mandatory hearing. *Southern Nuclear Operating Co. (Vogtle Electric Generating Plant, Units 3 and 4) (Scheduling Order)* (Sept. 13, 2011) (unpublished). If these documents do not meet the requirements of a future scheduling order in this proceeding, then SCE&G will revise and re-file the documents as necessary.

Respectfully submitted,

Executed in Accord with 10 C.F.R. § 2.304(d)

Signed (electronically) by Kathryn M. Sutton

Kathryn M. Sutton, Esq.

Lawrence J. Chandler, Esq.

Stephen J. Burdick, Esq.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Phone: 202-739-5738

Fax: 202-739-3001

E-mail: ksutton@morganlewis.com

Alvis J. Bynum Jr., Esq.

SCANA Corporation

1426 Main Street

Columbia, SC 29201

Phone: 803-217-6102

Fax: 803-217-7810

E-mail: abynum@scana.com

*COUNSEL FOR SCE&G*

Dated in Washington, DC  
this 27th day of September 2011

**ATTACHMENT 1 – SCE&G List of Anticipated Witnesses**

SCE&G identifies the following list of anticipated witnesses to support the V.C. Summer Units 2 and 3 mandatory hearing. Their curricula vitae are provided as separate exhibits as indicated under their names. These exhibits are being filed concurrently with this witness list.

<p><b>Stephen A. Byrne</b>          Executive Vice President, Generation &amp; Transmission, and Chief Operating Officer          South Carolina Electric &amp; Gas Company          220 Operation Way          Cayce, SC 29033          Phone: (803) 217-8653          E-mail: sbyrne@scana.com  <i>Curriculum vitae – Exhibit VCS000005</i></p>	<p><b>Alfred M. Paglia, Jr.</b>          Manager, Nuclear Licensing          South Carolina Electric &amp; Gas Company          P.O. Box 88          Jenkinsville, SC 29065          Phone: (803) 345-4191          E-mail: apaglia@scana.com  <i>Curriculum vitae – Exhibit VCS000006</i></p>
<p><b>Amy M. Monroe</b>          Licensing Engineer          South Carolina Electric &amp; Gas Company          P.O. Box 88          Jenkinsville, SC 29065          Phone: (803) 941-9857          E-mail: amonroe@scana.com  <i>Curriculum vitae – Exhibit VCS000007</i></p>	<p><b>April R. Rice</b>          Licensing Supervisor          South Carolina Electric &amp; Gas Company          P.O. Box 88          Jenkinsville, SC 29065          Phone: (803) 345-4232          E-mail: arice@scana.com  <i>Curriculum vitae – Exhibit VCS000008</i></p>
<p><b>Robert B. Whorton</b>          Consulting Engineer          South Carolina Electric &amp; Gas Company          P.O. Box 88          Jenkinsville, SC 29065          Phone: (803) 345-4725          E-mail: rwhorton@scana.com  <i>Curriculum vitae – Exhibit VCS000009</i></p>	<p><b>Robert E. Williamson</b>          Manager, Emergency Planning          South Carolina Electric &amp; Gas Company          P.O. Box 88          Jenkinsville, SC 29065          Phone: (803) 345-4464          E-mail: rewilliamson@scana.com  <i>Curriculum vitae – Exhibit VCS000010</i></p>
<p><b>Stephen E. Summer</b>          Supervisor, Environmental Services          SCANA Services, Inc.          220 Operation Way          Cayce, SC 29033          Phone: (803) 217-7357          E-mail: ssummer@scana.com  <i>Curriculum vitae – Exhibit VCS000011</i></p>	

**ATTACHMENT 2 – SCE&G Exhibit List**

<b>Exhibit Number</b>	<b>Panel Number/ Sponsoring Witness(es)</b>	<b>Document Description/Title</b>
VCS000001	Robert B. Whorton; Amy M. Monroe; Robert E. Williamson; April R. Rice; Stephen E. Summer	South Carolina Electric & Gas Company's Answers to the Commission Questions for the V.C. Summer Units 2 and 3 Mandatory Hearing (Sept. 27, 2011)
VCS000002	Stephen A. Byrne; Alfred M. Paglia, Jr.	Testimony of Stephen A. Byrne and Alfred M. Paglia, Jr. in Support of the Mandatory Hearing for V.C. Summer Units 2 and 3 Combined Licenses (Sept. 27, 2011)
VCS000003	Amy M. Monroe	Testimony of Amy M. Monroe in Support of the Mandatory Hearing for V.C. Summer Units 2 and 3 Combined Licenses (Sept. 27, 2011)
VCS000004	April R. Rice	Testimony of April R. Rice in Support of the Mandatory Hearing for V.C. Summer Units 2 and 3 Combined Licenses (Sept. 27, 2011)
VCS000005	Stephen A. Byrne	Curriculum Vitae of Stephen A. Byrne (Sept. 27, 2011)
VCS000006	Alfred M. Paglia, Jr.	Curriculum Vitae of Alfred M. Paglia, Jr. (Sept. 27, 2011)
VCS000007	Amy M. Monroe	Curriculum Vitae of Amy M. Monroe (Sept. 27, 2011)
VCS000008	April R. Rice	Curriculum Vitae of April R. Rice (Sept. 27, 2011)
VCS000009	Robert B. Whorton	Curriculum Vitae of Robert B. Whorton (Sept. 27, 2011)
VCS000010	Robert E. Williamson	Curriculum Vitae of Robert E. Williamson (Sept. 27, 2011)
VCS000011	Stephen E. Summer	Curriculum Vitae of Stephen E. Summer (Sept. 27, 2011)

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_____ )	

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 27, 2011, copies of “South Carolina Electric & Gas Company’s Pre-Filed Documents for the V.C. Summer Units 2 and 3 Mandatory Hearing” and Exhibits VCS000001 through VCS000011 were served electronically with the Electronic Information Exchange on the following recipients:

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Rulemakings and Adjudications Staff  
Washington, DC 20555-0001  
E-mail: hearingdocket@nrc.gov

Office of Commission Appellate  
Adjudication  
U.S. Nuclear Regulatory Commission  
Mail Stop: O-16C1  
Washington, DC 20555-0001  
E-mail: ocaamail@nrc.gov

Jody Martin, Esq.  
Sara Kirkwood, Esq.  
Marian Zabler, Esq.  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Mail Stop O-15D21  
Washington, DC 20555-0001  
Email: Jody.Martin@nrc.gov;  
Sara.Kirkwood@nrc.gov;  
Marian.Zabler@nrc.gov

*Signed (electronically) by Stephen J. Burdick*

Stephen J. Burdick, Esq.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Phone: 202-739-5059

Fax: 202-739-3001

E mail: sburdick@morganlewis.com

*COUNSEL FOR SCE&G*

DB1/68119315