

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)	)		
	)		

TESTIMONY OF AMY M. MONROE
IN SUPPORT OF THE MANDATORY HEARING
FOR V.C. SUMMER UNITS 2 AND 3 COMBINED LICENSES

I. WITNESS BACKGROUND

Q1. Please state your name, occupation, and business address.

A1. My name is Amy M. Monroe. I hold the position of Licensing Engineer for South Carolina Electric & Gas Company (SCE&G). My business address is P.O. Box 88, Jenkinsville, SC 29065.

Q2. Please describe your educational and professional background.

A2. I earned a Bachelor of Science degree in Mechanical Engineering from the University of South Carolina in 1983. I have worked at SCE&G for 28 years. My experience encompasses 24 years of nuclear power plant engineering in the fields of licensing and system performance. My job requires knowledge of the licensing practices and procedures for nuclear power plants, including all aspects of site design, installation, environmental qualifications, construction, and regulatory interpretations. I have experience with various aspects of licensing of nuclear plants, including the regulatory requirements, policies, and practices. I have

performed evaluations of design changes in licensing, processed license amendments, performed overviews of plant systems, and monitored equipment operation to establish preventative maintenance programs. I am an AP1000 representative for the NuStart Design Centered Working Group (DCWG), and I regularly participate in the industry's new nuclear development activities. I am the lead for the safety aspects of the V.C. Summer Units 2 and 3 Combined License Application (COLA). My *curriculum vitae* is provided as Exhibit VCS000007.

Q3. Please summarize the purpose of your testimony.

A3. The purpose of my testimony is to describe the regulatory requirements applicable to the safety aspects of SCE&G's COLA for V.C. Summer Units 2 and 3, and explain how SCE&G meets such requirements. The testimony first provides an overview of safety information in the COLA. The testimony then addresses the applicable regulations in 10 C.F.R. Part 52. I do not repeat the full content of SCE&G's COLA in this testimony, but rather simply reference where in the COLA SCE&G addresses each regulatory requirement. I also discuss the relationship between the COLA and the AP1000 Reference COLA. Finally, the testimony discusses the nature and scope of the Nuclear Regulatory Commission (NRC) staff's safety review.

Concurrently with my testimony, SCE&G is submitting the testimony of Witnesses Byrne and Paglia, which gives a broad overview of how the regulatory requirements for SCE&G's COLA are structured, and provides a basis for the Commission's ability to make an ultimate finding that the COLs should be issued. My testimony covers safety requirements; *i.e.*, licensing requirements not related to NRC's obligations under the National Environmental Policy Act (NEPA). Also concurrently with Witnesses Byrne's and Paglia's testimony and this

testimony, SCE&G is submitting the testimony of Witness Rice, which addresses the applicable NEPA requirements.

II. SAFETY INFORMATION FOR V.C. SUMMER UNITS 2 AND 3

A. Overview

Q4. What safety information forms part of the COLA for V.C. Summer Units 2 and 3?

A4. In general terms, all parts of the COLA except for the Environmental Report (Part 3) provide information that could be related to safety issues. These include the following parts:

- Part 1 – General and Administrative Information
- Part 2 – Final Safety Analysis Report (FSAR)
- Part 4 – Technical Specifications
- Part 5 – Emergency Plan
- Part 6 – Not Applicable (because no Limited Work Authorization)
- Part 7 – Departures and Exemptions
- Part 8 – Safeguards/Security Plans (withheld from public availability)
- Part 9 – Other Withheld Information (financial and security information)
- Part 10 – Proposed License Conditions and Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)
- Part 11 – Subsurface Reports
- Part 12 – Seismic Technical Advisory Review Letter
- Part 13 – Quality Assurance Program Description
- Part 14 – Mitigative Strategies Description and Plans (withheld from public availability)
- Part 15 – Cyber Security Plan (withheld from public availability)
- Part 16 – Special Nuclear Material Control and Accounting Program Description

- Part 17 – New Fuel Shipping Plan
- Part 18 – Supplemental Information in Support of 10 C.F.R. Part 70 Special Nuclear Material License Application

Q5. When did SCE&G submit these parts of the COLA for V.C. Summer Units 2 and 3?

A5. SCE&G submitted Revision 0 of the COLA to the NRC on March 27, 2008, Revision 1 on July 30, 2009, Revision 2 on January 28, 2010, Revision 3 on August 25, 2010, Revision 4 on February 7, 2011, and Revision 5 on June 28, 2011.

Q6. Does the COLA incorporate by reference a certified design?

A6. Yes. SCE&G's COLA incorporates by reference Appendix D to 10 C.F.R. Part 52 and the Westinghouse Electric Company's application for amendment to portions of the AP1000 DCD, Revision 19, submitted on June 13, 2011.

B. Compliance with 10 C.F.R. Part 52 COLA Requirements

Q7. Does the COLA meet all applicable Part 52 requirements?

A7. Yes. As shown below, the COLA satisfies all of the requirements in 10 C.F.R. Part 52, including those found in 10 C.F.R. §§ 52.73, 52.75, 52.77, 52.79, 52.80, and Part 52, Appendix D.

Q8. Please describe these requirements.

A8. Section 52.73 (Relationship to Other Subparts) includes requirements regarding a design supplier and the availability of procurement information. Section 52.75 (Filing of Applications) includes requirements regarding who may file a COLA and corresponding filing requirements. Section 52.77 (Contents of Applications; General Information) includes general information requirements for the COLA. Section 52.79 (Contents of Applications; Technical Information in Final Safety Analysis Report) includes requirements for the content of the FSAR.

Section 52.80 (Contents of Applications; Additional Technical Information) includes requirements for additional technical information that must be provided in the COLA. Part 52, Appendix D is the design certification rule for the AP1000 design, and includes requirements for COLAs that reference the AP1000 design.

Q9. How are these requirements met in the COLA?

A9. Attachment 1 to this testimony provides a table that identifies all of the regulations specified above, and identifies which part of the COLA addresses those requirements. In some cases, the referenced FSAR sections incorporate by reference parts of the AP1000 DCD, which in turn provide the required information. This crosswalk between the applicable regulations and the content of the COLA describes how the COLA meets the requirements.

C. Exemptions and Departures

Q10. Does the COLA include any exemptions from applicable regulations?

A10. Yes. As described in Section B of COLA Part 7, SCE&G requested three exemptions. The first request was for an exemption from certain COLA organization and numbering requirements in 10 C.F.R. Part 52, Appendix D, Section IV.A.2.a. The second request was for an exemption from the requirements in 10 C.F.R. Part 52, Appendix D, Section IV.A.2.d, to demonstrate “compliance with the site parameters and interface requirements” with respect to the maximum safety wet bulb (noncoincident) air temperature. The third request was for an exemption from requirements in 10 C.F.R. §§ 70.22(b), 70.32(c), 74.31, 74.41, and 74.51 regarding the Special Nuclear Material Control and Accounting program description. Additional details regarding these exemption requests are provided in COLA Part 7, Section B.

Q11. Does the COLA include any departures from the certified design?

A11. Yes. As described in Section A of COLA Part 7 and listed in FSAR Table 1.8-201, SCE&G identified five departures. The first departure (STD DEP 1.1-1) is an administrative departure for organization and numbering for the FSAR sections. The second departure (VCS DEP 2.0-1) is an administrative departure for organization and numbering for FSAR Chapter 2. The third departure (VCS DEP 2.0-2) is a departure regarding the maximum safety wet bulb (noncoincident) air temperature. The fourth departure (STD DEP 8.3-1) is a departure regarding the Class 1E voltage regulating transformer current limiting features. The fifth departure (VCS DEP 18.8-1) is a departure regarding the emergency response facility locations. The first and fourth departures, which have a “STD” designation, are standard departures for plants referencing the AP1000 design, while the second, third, and fifth departures, which have a “VCS” designation, are specific to the V.C. Summer Units 2 and 3 COLA. Additional details regarding these departures are provided in COLA Part 7, Section A.

D. COL Information Items

Q12. What are COL Information Items?

A12. COL Information Items identify certain matters that must be addressed in the site-specific portion of the FSAR by an applicant who references a certified design, such as 10 C.F.R. Part 52, Appendix D, for the AP1000 design. For the AP1000, DCD Tier 2 Table 1.8-2 includes the COL Information Items that must be addressed by a COLA referencing the AP1000 design.

Q13. Where are the COL Information Items identified?

A13. The COL Information Items included in DCD Tier 2 Table 1.8-2 are cataloged in FSAR Table 1.8-202, which points to the FSAR section where each outstanding COL Information Item is addressed. The full text within each Information Item in general is found at

the end of each DCD chapter or major section. Each COL Information Item is then addressed in an appropriate location in the COLA, consistent with Regulatory Guide 1.206.

Q14. How does SCE&G meet or satisfy the COL Information Items?

A14. Many of the Information Items require information or analyses from the COL applicant, contained in the COLA FSAR itself. For those items, the FSAR simply provides the required information or analysis. Other COL items may require particular information or action by the COL holder, which SCE&G, as an applicant, is not yet able to complete (such as performing pre-operational tests and inspections). For those, SCE&G addresses the COL Information Item by making a commitment in the COLA to future action. These commitments also are included as proposed license conditions.

Q15. Did SCE&G address each COL Information Item?

A15. Yes. SCE&G satisfied, or committed to satisfy, every outstanding COL Information Item.

E. Standard and Site-Specific Content

Q16. Does the SCE&G FSAR use standard information from the “Reference COLA”?

A16. Yes. As explained in more detail in the testimony of Witnesses Byrne and Paglia, the SCE&G COLA is a “Subsequent COLA” (or S-COLA) since it follows the COLA submitted by Southern Nuclear Company for Vogtle Units 3 and 4, the “Reference COLA” (or R-COLA), which also references the AP1000 DCD. The R-COLA identifies “standard” content that could apply to any applicant that references the AP1000 design. For example, the R-COLA identifies standard information to address some of the COL Information Items, standard information to supplement the content of the generic DCD, and standard information to depart from the generic

DCD. This standard information is marked throughout the FSAR using left margin annotations according to FSAR Table 1.1-202.

Q17. Does the SCE&G FSAR follow the standard information identified in the R-COLA?

A17. The SCE&G FSAR generally follows the standard content of the R-COLA without any substantial deviations. The few deviations are related to site-specific differences. For example, FSAR Table 1.9-201 identifies Regulatory Guides and where they are addressed in the FSAR. This table includes several site-specific “administrative” deviations from the R-COLA because the table identifies different cross-references, even though compliance with the Regulatory Guides is not necessarily different. Another example is FSAR Section 9.4.1.1.1, which addresses the safety design basis for the Air-Conditioning, Heating, Cooling, and Ventilation System. This is a site-specific section that was added by SCE&G to clarify that no toxic emergencies due to onsite and offsite sources of toxic chemicals have been identified.

Q18. How did SCE&G ensure that the standard information from the R-COLA was applicable to the V.C. Summer COLA?

A18. All material identified as standard, including initial COLA information, responses to requests for additional information (RAIs), and any other resulting COLA revisions were reviewed internally as if it were site-specific material to ensure that the information was applicable to the V.C. Summer site. RAI responses were reviewed prior to the initial response by the R-COLA as part of the overall DCWG team review, and then received an additional review prior to SCE&G notifying the NRC, via a docketed submittal to the NRC, of the SCE&G acceptance and incorporation of the standard material into the V.C. Summer Units 2 and 3 COLA.

Q19. Does the SCE&G FSAR include site-specific information?

A19. Yes. Similar to all applicants, the SCE&G FSAR includes site-specific information. For example, the FSAR provides site-specific information to address some of the COL Information Items that cannot be resolved generically by all applicants, site-specific information to supplement the content of the generic DCD, and site-specific information to depart from the generic DCD. This site-specific information is marked throughout the FSAR using left margin annotations according to FSAR Table 1.1-202.

III. NRC STAFF SAFETY REVIEW

Q20. Please describe SCE&G's role in the NRC staff's safety review process for the COLA.

A20. SCE&G developed the V.C. Summer Units 2 and 3 COLA such that the staff could review the safety information in the COLA against applicable regulatory requirements, following the guidance set out in the Standard Review Plan. The staff prepared a Safety Evaluation Report to document its review. In August 2011, the NRC published its Final Safety Evaluation Report (FSER) for the V.C. Summer COLA. Final Safety Evaluation Report for Combined Licenses for Virgil C. Summer Nuclear Station Units 2 and 3 (Aug. 2011). This FSER was the culmination of a comprehensive review by the NRC staff of the COLA that entailed numerous interactions with SCE&G during the three year review process. My role was the primary SCE&G lead for these interactions. During the course of this COLA review, SCE&G responded to approximately 500 individual information requests on safety topics. Most of these requests were to provide additional clarifying information on specific issues, and some of the requests involved changes to the COLA in order to satisfy the technical requirements of the NRC reviewers. When necessary, public meetings were scheduled to allow technical staff

from both SCE&G and the NRC to discuss issues in an open and transparent manner such that staff concerns could be effectively resolved.

Q21. What is the staff's conclusion in the FSER regarding V.C. Summer Units 2 and 3?

A21. The staff concluded in the FSER that:

- 1) The applicable standards and requirements of the Atomic Energy Act and Commission's regulations have been met;
- 2) Required notifications to other agencies or bodies have been duly made;
- 3) There is reasonable assurance that the facility will be constructed and will operate in conformity with the license, the provisions of the Atomic Energy Act, and the Commission's regulations;
- 4) The applicant is technically and financially qualified to engage in the activities authorized; and
- 5) Issuance of the license will not be inimical to the common defense and security or to the health and safety of the public.

Q22. How did the staff review standard content between the R-COLA and S-COLA?

A22. FSER Section 1.2.3 (Overview of the Design-Centered Review Approach) explains the strategy used by the staff to perform one technical review for each standard issue between the R-COLA and S-COLA. The staff ensured that its findings on standard content for the R-COLA were equally applicable to the S-COLA by (1) comparing the R-COLA FSAR with the S-COLA FSAR, including changes made to respond to RAIs; (2) confirming that all responses to RAIs related to standard content were endorsed; and (3) verifying that any site-specific differences were not relevant. Therefore, although the FSER relies upon earlier

technical reviews for some standard topics, in substance, it provides a full evaluation of the safety issues for the S-COLA.

Q23. Are the findings in 10 C.F.R. § 52.97(a) met for V.C. Summer Units 2 and 3?

A23. Yes. As detailed above, all safety findings were supported by the information in SCE&G's COLA. Overall, in terms of 10 C.F.R. § 52.97(a), the staff's review was adequate to demonstrate that:

- The applicable standards and requirements of the Act and the Commission's regulations have been met;
- Any required notifications to other agencies or bodies have been duly made;
- There is reasonable assurance that the facility will be constructed and will operate in conformity with the license, the provisions of the Act, and the Commission's regulations;
- The applicant is technically and financially qualified to engage in the activities authorized; and
- Issuance of the license will not be inimical to the common defense and security or to the health and safety of the public.

Q24. Has the staff submitted information to support the mandatory hearing for V.C. Summer Units 2 and 3?

A24. Yes. On August 19, 2011, the staff issued SECY-11-0115, "Staff Statement in Support of the Uncontested Hearing for Issuance of Combined Licenses for the Virgil C. Summer Nuclear Station, Units 2 and 3 (Docket Nos. 52-027 and 52-028)."

Q25. Have you reviewed SECY-11-0115?

A25. Yes.

Q26. Does SECY-11-0115 address safety issues regarding V.C. Summer Units 2 and 3?

A26. Yes. SECY-11-0115 describes the safety review performed by the staff for V.C. Summer Units 2 and 3. SECY-11-0115 also describes the Advisory Committee on Reactor Safeguards (ACRS) Report issued on February 17, 2011, including recommendations regarding V.C. Summer Units 2 and 3 (page 8). SECY-11-0115 further describes exemptions from NRC regulations and departures from the AP1000 DCD (pages 10-13). Finally, SECY-11-0115 describes safety matters that the staff considers to be “Nonroutine Unique Facility Features or Novel Issues” (pages 13-16), including (1) Emergency Planning Zone for VCSNS Units 2 and 3, and (2) Maximum Safety Wet Bulb (Noncoincident) Temperature.

Q27. Do you agree with the conclusions reached in SECY-11-0115 regarding the staff safety review, ACRS Report, exemptions and departures, and the safety matters the staff considers to be “Nonroutine Unique Facility Features or Novel Issues”?

A27. Yes.

Q28. Does SECY-11-0115 evaluate the findings in 10 C.F.R. § 52.97(a)(1)?

A28. Yes.

Q29. What does the staff conclude regarding these findings?

A29. The staff concludes that all of the findings have been satisfied.

Q30. Do you agree with the staff’s description of how the findings have been satisfied?

A30. Yes.

Q31. Are true, accurate, and correct copies of each of the referenced exhibits submitted with your testimony?

A31. Yes.

Q32. Does this conclude your testimony?

A32. Yes.

I certify that this written testimony was prepared by me or under my direction, and I adopt the testimony as my sworn testimony in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on September 27, 2011.

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

/s/ Amy M. Monroe

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ATTACHMENT 1 – Compliance with Applicable 10 C.F.R. Part 52 COLA Requirements

Regulation	Requirement	COLA Location
52.73(a)	An application for a combined license under this subpart may, but need not, reference a standard design certification, standard design approval, or manufacturing license issued under subparts B, E, or F of this part, respectively, or an early site permit issued under subpart A of this part. In the absence of a demonstration that an entity other than the one originally sponsoring and obtaining a design certification is qualified to supply a design, the Commission will entertain an application for a combined license that references a standard design certification issued under subpart B of this part only if the entity that sponsored and obtained the certification supplies the design for the applicant's use.	FSAR Sections 1.1 and 1.4 explain that Westinghouse Electric Company sponsored and obtained the design certification for the AP1000 in 10 C.F.R. Part 52, Appendix D, which is referenced in the COLA, and Westinghouse will be part of the consortium supplying the design for SCE&G.
52.73(b)	The Commission will require, before granting a combined license that references a standard design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to make its safety determinations, including the determination that the application is consistent with the certification information.	SCE&G has provided or made available during audits any requested information regarding procurement specifications and construction and installation specifications.
52.75	(a) Any person except one excluded by § 50.38 of this chapter may file an application for a combined license for a nuclear power facility with the Director, Office of New Reactors or Director, Office of Nuclear Reactor Regulation, as appropriate. (b) The application must comply with the applicable filing requirements of §§ 52.3 and 50.30 of this chapter. (c) The fees associated with the filing and review of the application are set forth in 10 CFR part 170.	COLA Part 1 (Administrative and Financial Information), Section 1.3.4, explains that SCE&G and Santee Cooper are not owned, controlled, or dominated by an alien, foreign corporation, or foreign government, and therefore are not excluded by § 50.38. Additionally, the cover letters providing versions of the COLA demonstrate the requirements of §§ 52.3 and 50.30 were met.
52.77	The application must contain all of the information required by 10 CFR 50.33.	See COLA Part 1 (Administrative and Financial Information) and Part 5 (Radiation Emergency Plan), App. 6, Table 5
52.79(a)	The application must contain a final safety analysis report that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components of the facility as a whole. The final safety analysis report shall include the following information, at a level of information sufficient to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license:	See COLA Part 2 (FSAR)

Regulation	Requirement	COLA Location
52.79(a)(1)	(i) The boundaries of the site; (ii) The proposed general location of each facility on the site; (iii) The seismic, meteorological, hydrologic, and geologic characteristics of the proposed site with appropriate consideration of the most severe of the natural phenomena that have been historically reported for the site and surrounding area and with sufficient margin for the limited accuracy, quantity, and time in which the historical data have been accumulated; (iv) The location and description of any nearby industrial, military, or transportation facilities and routes; (v) The existing and projected future population profile of the area surrounding the site; (vi) A description and safety assessment of the site on which the facility is to be located. The assessment must contain an analysis and evaluation of the major structures, systems, and components of the facility that bear significantly on the acceptability of the site under the radiological consequence evaluation factors identified in paragraphs (a)(1)(vi)(A) and (a)(1)(vi)(B) of this section. In performing this assessment, an applicant shall assume a fission product release from the core into the containment assuming that the facility is operated at the ultimate power level contemplated. The applicant shall perform an evaluation and analysis of the postulated fission product release, using the expected demonstrable containment leak rate and any fission product cleanup systems intended to mitigate the consequences of the accidents, together with applicable site characteristics, including site meteorology, to evaluate the offsite radiological consequences. Site characteristics must comply with part 100 of this chapter. The evaluation must determine that: (A) An individual located at any point on the boundary of the exclusion area for any 2-hour period following the onset of the postulated fission product release, would not receive a radiation dose in excess of 25 rem total effective dose equivalent (TEDE). (B) An individual located at any point on the outer boundary of the low population zone, who is exposed to the radioactive cloud resulting from the postulated fission product release (during the entire period of its passage) would not receive a radiation dose in excess of 25 rem TEDE; and	See COLA Part 2 (FSAR), Chapter 2 (Site Characteristics) and Chapter 15 (Accident Analyses)

Regulation	Requirement	COLA Location
52.79(a)(2)	A description and analysis of the structures, systems, and components of the facility with emphasis upon performance requirements, the bases, with technical justification therefor, upon which these requirements have been established, and the evaluations required to show that safety functions will be accomplished. It is expected that reactors will reflect through their design, construction, and operation an extremely low probability for accidents that could result in the release of significant quantities of radioactive fission products. The descriptions shall be sufficient to permit understanding of the system designs and their relationship to safety evaluations. Items such as the reactor core, reactor coolant system, instrumentation and control systems, electrical systems, containment system, other engineered safety features, auxiliary and emergency systems, power conversion systems, radioactive waste handling systems, and fuel handling systems shall be discussed insofar as they are pertinent. The following power reactor design characteristics and proposed operation will be taken into consideration by the Commission: (i) Intended use of the reactor including the proposed maximum power level and the nature and inventory of contained radioactive materials; (ii) The extent to which generally accepted engineering standards are applied to the design of the reactor; (iii) The extent to which the reactor incorporates unique, unusual or enhanced safety features having a significant bearing on the probability or consequences of accidental release of radioactive materials; (iv) The safety features that are to be engineered into the facility and those barriers that must be breached as a result of an accident before a release of radioactive material to the environment can occur. Special attention must be directed to plant design features intended to mitigate the radiological consequences of accidents. In performing this assessment, an applicant shall assume a fission product release from the core into the containment assuming that the facility is operated at the ultimate power level contemplated;	See COLA Part 2 (FSAR), Chapters 3 (Design of Structures, Components, Equipment and Systems), 4 (Reactor), 5 (Reactor Coolant System and Connected Systems), 6 (Engineered Safety Features), 7 (Instrumentation and Controls), 8 (Electric Power), 9 (Auxiliary Systems), 10 (Steam and Power Conversion), 11 (Radioactive Waste Management), 12 (Radiation Protection), and 15 (Accident Analyses)
52.79(a)(3)	The kinds and quantities of radioactive materials expected to be produced in the operation and the means for controlling and limiting radioactive effluents and radiation exposures within the limits set forth in part 20 of this chapter;	See COLA Part 2 (FSAR), Chapters 11 (Radioactive Waste Management) and 12 (Radiation Protection)

Regulation	Requirement	COLA Location
52.79(a)(4)	The design of the facility including: (i) The principal design criteria for the facility. Appendix A to part 50 of this chapter, "General Design Criteria for Nuclear Power Plants," establishes minimum requirements for the principal design criteria for water-cooled nuclear power plants similar in design and location to plants for which construction permits have previously been issued by the Commission and provides guidance to applicants in establishing principal design criteria for other types of nuclear power units; (ii) The design bases and the relation of the design bases to the principal design criteria; (iii) Information relative to materials of construction, arrangement, and dimensions, sufficient to provide reasonable assurance that the design will conform to the design bases with adequate margin for safety.	See COLA Part 2 (FSAR), Chapters 2 (Site Characteristics), 3 (Design of Structures, Components, Equipment and Systems), 4 (Reactor), 5 (Reactor Coolant System and Connected Systems), 6 (Engineered Safety Features), 7 (Instrumentation and Controls), 8 (Electric Power), 9 (Auxiliary Systems), 10 (Steam and Power Conversion), 11 (Radioactive Waste Management), and 12 (Radiation Protection).
52.79(a)(5)	An analysis and evaluation of the design and performance of structures, systems, and components with the objective of assessing the risk to public health and safety resulting from operation of the facility and including determination of the margins of safety during normal operations and transient conditions anticipated during the life of the facility, and the adequacy of structures, systems, and components provided for the prevention of accidents and the mitigation of the consequences of accidents. Analysis and evaluation of ECCS cooling performance and the need for high-point vents following postulated loss-of-coolant accidents shall be performed in accordance with the requirements of §§ 50.46 and 50.46a of this chapter;	See COLA Part 2 (FSAR), Chapters 3 (Design of Structures, Components, Equipment and Systems), 4 (Reactor), 5 (Reactor Coolant System and Connected Systems), 6 (Engineered Safety Features), 7 (Instrumentation and Controls), 8 (Electric Power), 9 (Auxiliary Systems), 10 (Steam and Power Conversion), 11 (Radioactive Waste Management), 12 (Radiation Protection), and 15 (Accident Analyses)
52.79(a)(6)	A description and analysis of the fire protection design features for the reactor necessary to comply with 10 CFR part 50, appendix A, GDC 3, and § 50.48 of this chapter;	See COLA Part 2 (FSAR), Section 9.5 (Other Auxiliary Systems) and App. 9A (Fire Protection Analysis)
52.79(a)(7)	A description of protection provided against pressurized thermal shock events, including projected values of the reference temperature for reactor vessel beltline materials as defined in §§ 50.60 and 50.61(b)(1) and (b)(2) of this chapter;	See COLA Part 2 (FSAR), Section 5.3 (Reactor Vessel)
52.79(a)(8)	An analysis and description of the equipment and systems for combustible gas control as required by § 50.44 of this chapter;	See COLA Part 2 (FSAR), Section 6.2 (Containment Systems)
52.79(a)(9)	The coping analyses, and any design features necessary to address station blackout, as described in § 50.63 of this chapter;	See COLA Part 2 (FSAR), including Section 1.9.5.1.5 (Station Blackout), Chapter 8 (Electric Power)
52.79(a)(10)	A description of the program, and its implementation, required by § 50.49(a) of this chapter for the environmental qualification of electric equipment important to safety and the list of electric equipment important to safety that is required by 10 CFR 50.49(d);	See COLA Part 2 (FSAR), Section 3.11 (Environmental Qualification of Mechanical and Electrical Equipment)
52.79(a)(11)	A description of the program(s), and their implementation, necessary to ensure that the systems and components meet the requirements of the ASME Boiler and Pressure Vessel Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants in accordance with 50.55a of this chapter;	See COLA Part 2 (FSAR), Chapters 3 (Design of Structures, Components, Equipment and Systems), 5 (Reactor Coolant System and Connected Systems), and 6 (Engineered Safety Features)

Regulation	Requirement	COLA Location
52.79(a)(12)	A description of the primary containment leakage rate testing program, and its implementation, necessary to ensure that the containment meets the requirements of appendix J to 10 CFR part 50;	See COLA Part 2 (FSAR), Section 6.2 (Containment Systems), Section 13.4 (Operational Programs)
52.79(a)(13)	A description of the reactor vessel material surveillance program required by appendix H to 10 CFR part 50 and its implementation;	See COLA Part 2 (FSAR), Section 5.3 (Reactor Vessel)
52.79(a)(14)	A description of the operator training program, and its implementation, necessary to meet the requirements of 10 CFR part 55;	See COLA Part 2 (FSAR), Section 13.2 (Training)
52.79(a)(15)	A description of the program, and its implementation, for monitoring the effectiveness of maintenance necessary to meet the requirements of § 50.65 of this chapter;	See COLA Part 2 (FSAR), Section 17.6 (Maintenance Rule Program)
52.79(a)(16)	(i) The information with respect to the design of equipment to maintain control over radioactive materials in gaseous and liquid effluents produced during normal reactor operations, as described in § 50.34a(d) of this chapter; (ii) A description of the process and effluent monitoring and sampling program required by appendix I to 10 CFR part 50 and its implementation.	See COLA Part 2 (FSAR), Chapter 11 (Radioactive Waste Management)
52.79(a)(17)	The information with respect to compliance with technically relevant positions of the Three Mile Island requirements in § 50.34(f) of this chapter, with the exception of §§ 50.34(f)(1)(xii), (f)(2)(ix), and (f)(3)(v);	See COLA Part 2 (FSAR), Section 1.9 (Compliance with Regulatory Criteria)
52.79(a)(18)	If the applicant seeks to use risk informed treatment of SSCs in accordance with § 50.69 of this chapter, the information required by § 50.69(b)(2) of this chapter;	Not Applicable
52.79(a)(19)	Information necessary to demonstrate that the plant complies with the earthquake engineering criteria in 10 CFR part 50, appendix S;	See COLA Part 2 (FSAR), Section 3.7 (Seismic Design)
52.79(a)(20)	Proposed technical resolutions of those Unresolved Safety Issues and medium- and high-priority generic safety issues which are identified in the version of NUREG-0933 current on the date up to 6 months before the docket date of the application and which are technically relevant to the design;	See COLA Part 2 (FSAR), Section 1.9 (Compliance with Regulatory Criteria)
52.79(a)(21)	Emergency plans complying with the requirements of § 50.47 of this chapter, and 10 CFR part 50, appendix E;	See COLA Part 2 (FSAR), Section 13.3 (Emergency Planning); COLA Part 5 (Radiation Emergency Plan)

Regulation	Requirement	COLA Location
52.79(a)(22)	(i) All emergency plan certifications that have been obtained from the State and local governmental agencies with emergency planning responsibilities must state that: (A) The proposed emergency plans are practicable; (B) These agencies are committed to participating in any further development of the plans, including any required field demonstrations; and (C) These agencies are committed to executing their responsibilities under the plans in the event of an emergency; (ii) If certifications cannot be obtained after sustained, good faith efforts by the applicant, then the application must contain information, including a utility plan, sufficient to show that the proposed plans provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the site.	See COLA Part 2 (FSAR), Section 13.3 (Emergency Planning); COLA Part 5 (Radiation Emergency Plan)
52.79(a)(23)	[Reserved]	Not Applicable
52.79(a)(24)	If the application is for a nuclear power reactor design which differs significantly from light-water reactor designs that were licensed before 1997 or use simplified, inherent, passive, or other innovative means to accomplish their safety functions, the application must describe how the design meets the requirements in § 50.43(e) of this chapter;	See COLA Part 2 (FSAR), Section 6.3 (Passive Core Cooling System)
52.79(a)(25)	A description of the quality assurance program, applied to the design, and to be applied to the fabrication, construction, and testing, of the structures, systems, and components of the facility. Appendix B to 10 CFR part 50 sets forth the requirements for quality assurance programs for nuclear power plants. The description of the quality assurance program for a nuclear power plant must include a discussion of how the applicable requirements of appendix B to 10 CFR part 50 have been and will be satisfied, including a discussion of how the quality assurance program will be implemented;	See COLA Part 2 (FSAR), Chapter 17 (Quality Assurance); COLA Part 13 (QAPD)
52.79(a)(26)	The applicant's organizational structure, allocations or responsibilities and authorities, and personnel qualifications requirements for operation;	See COLA Part 2 (FSAR), Section 13.1 (Organizational Structure of Applicant), Chapter 14 (Initial Test Program); COLA Part 13 (QAPD)
52.79(a)(27)	Managerial and administrative controls to be used to assure safe operation. Appendix B to 10 CFR part 50 sets forth the requirements for these controls for nuclear power plants. The information on the controls to be used for a nuclear power plant shall include a discussion of how the applicable requirements of appendix B to 10 CFR part 50 will be satisfied;	See COLA Part 2 (FSAR), Section 13.5 (Plant Procedures), Chapter 14 (Initial Test Program), Chapter 16 (Technical Specifications), Chapter 17 (Quality Assurance); COLA Part 4 (Technical Specifications); COLA Part 13 (QAPD)
52.79(a)(28)	Plans for preoperational testing and initial operations;	See COLA Part 2 (FSAR), Chapter 14 (Initial Test Program)
52.79(a)(29)	(i) Plans for conduct of normal operations, including maintenance, surveillance, and periodic testing of structures, systems, and components; (ii) Plans for coping with emergencies, other than the plans required by § 52.79(a)(21);	See COLA Part 2 (FSAR), Section 13.5 (Plant Procedures), Chapter 16 (Technical Specifications); COLA Part 4 (Technical Specifications)

Regulation	Requirement	COLA Location
52.79(a)(30)	Proposed technical specifications prepared in accordance with the requirements of §§ 50.36 and 50.36a of this chapter;	See COLA Part 2 (FSAR), Chapter 16 (Technical Specifications); COLA Part 4 (Technical Specifications)
52.79(a)(31)	For nuclear power plants to be operated on multi-unit sites, an evaluation of the potential hazards to the structures, systems, and components important to safety of operating units resulting from construction activities, as well as a description of the managerial and administrative controls to be used to provide assurance that the limiting conditions for operation are not exceeded as a result of construction activities at the multi-unit sites;	See COLA Part 2 (FSAR), Section 1.10
52.79(a)(32)	The technical qualifications of the applicant to engage in the proposed activities in accordance with the regulations in this chapter;	See COLA Part 2 (FSAR), Section 1.4 (Identification of Agents and Contractors), Section 13.1 (Organizational Structure of Applicant), Chapter 14 (Initial Test Program)
52.79(a)(33)	A description of the training program required by § 50.120 of this chapter and its implementation;	See COLA Part 2 (FSAR), Section 13.2 (Training)
52.79(a)(34)	A description and plans for implementation of an operator requalification program. The operator requalification program must as a minimum, meet the requirements for those programs contained in § 55.59 of this chapter	See COLA Part 2 (FSAR), Section 13.2 (Training)
52.79(a)(35)	(i) A physical security plan, describing how the applicant will meet the requirements of 10 CFR part 73 (and 10 CFR part 11, if applicable, including the identification and description of jobs as required by § 11.11(a) of this chapter, at the proposed facility). The plan must list tests, inspections, audits, and other means to be used to demonstrate compliance with the requirements of 10 CFR parts 11 and 73, if applicable; (ii) A description of the implementation of the physical security plan;	See COLA Part 2 (FSAR), Section 13.6 (Security); COLA Part 8 (Safeguards/Security Plans)

Regulation	Requirement	COLA Location
52.79(a)(36)	(i) A safeguards contingency plan in accordance with the criteria set forth in appendix C to 10 CFR part 73. The safeguards contingency plan shall include plans for dealing with threats, thefts, and radiological sabotage, as defined in part 73 of this chapter, relating to the special nuclear material and nuclear facilities licensed under this chapter and in the applicant's possession and control. Each application for this type of license shall include the information contained in the applicant's safeguards contingency plan. (Implementing procedures required for this plan need not be submitted for approval.) (ii) A training and qualification plan in accordance with the criteria set forth in appendix B to 10 CFR part 73. (iii) A cyber security plan in accordance with the criteria set forth in § 73.54 of this chapter; (iv) A description of the implementation of the safeguards contingency plan, training and qualification plan, and cyber security plan; and (v) Each applicant who prepares a physical security plan, a safeguards contingency plan, a training and qualification plan, or a cyber security plan, shall protect the plans and other related Safeguards Information against unauthorized disclosure in accordance with the requirements of § 73.21 of this chapter.	See COLA Part 2 (FSAR), Section 13.4 (Operational Programs), Section 13.6 (Security); COLA Part 8 (Safeguards/Security Plans)
52.79(a)(37)	The information necessary to demonstrate how operating experience insights have been incorporated into the plant design;	See COLA Part 2 (FSAR), Section 1.9 (Compliance with Regulatory Criteria)
52.79(a)(38)	For light-water reactor designs, a description and analysis of design features for the prevention and mitigation of severe accidents, e.g., challenges to containment integrity caused by core-concrete interaction, steam explosion, high-pressure core melt ejection, hydrogen combustion, and containment bypass;	See COLA Part 2 (FSAR), Chapter 19 (Probabilistic Risk Assessment), including Section 19.34 (Severe Accident Phenomena Treatment)
52.79(a)(39)	A description of the radiation protection program required by § 20.1101 of this chapter and its implementation.	See COLA Part 2 (FSAR), Chapter 12 (Radiation Protection)
52.79(a)(40)	A description of the fire protection program required by § 50.48 of this chapter and its implementation.	See COLA Part 2 (FSAR), Section 9.5 (Other Auxiliary Systems) and App. 9A (Fire Protection Analysis)
52.79(a)(41)	For applications for light-water-cooled nuclear power plant combined licenses, an evaluation of the facility against the Standard Review Plan (SRP) revision in effect 6 months before the docket date of the application. The evaluation required by this section shall include an identification and description of all differences in design features, analytical techniques, and procedural measures proposed for a facility and those corresponding features, techniques, and measures given in the SRP acceptance criteria. Where a difference exists, the evaluation shall discuss how the proposed alternative provides an acceptable method of complying with the Commission's regulations, or portions thereof, that underlie the corresponding SRP acceptance criteria. The SRP is not a substitute for the regulations, and compliance is not a requirement;	See COLA Part 2 (FSAR), Section 1.9 (Compliance with Regulatory Criteria)

Regulation	Requirement	COLA Location
52.79(a)(42)	Information demonstrating how the applicant will comply with requirements for reduction of risk from anticipated transients without scram (ATWS) events in § 50.62 of this chapter;	See COLA Part 2 (FSAR), Section 7.7 (Control and Instrumentation Systems), Section 15.8 (Anticipated Transients Without Scram)
52.79(a)(43)	Information demonstrating how the applicant will comply with requirements for criticality accidents in § 50.68 of this chapter;	See COLA Part 2 (FSAR), Section 9.1 (Fuel Storage and Handling)
52.79(a)(44)	A description of the fitness-for-duty program required by 10 CFR part 26 and its implementation.	See COLA Part 2 (FSAR), Section 13.7 (Fitness for Duty)
52.79(a)(45)	The information required by § 20.1406 of this chapter.	See COLA Part 2 (FSAR), Chapter 12 (Radiation Protection)
52.79(a)(46)	A description of the plant-specific probabilistic risk assessment (PRA) and its results.	See COLA Part 2 (FSAR), Chapter 19 (Probabilistic Risk Assessment), including Section 19.59 (PRA Results and Insights)
52.79(a)(47)	For applications for combined licenses which are subject to 10 CFR 50.150(a), the information required by 10 CFR 50.150(b).	Not Applicable
52.79(b)	Requirements if the COLA references an Early Site Permit.	Not Applicable
52.79(c)	Requirements if the COLA references a Standard Design Approval.	Not Applicable
52.79(d)	If the combined license application references a standard design certification, then the following requirements apply:	See Below
52.79(d)(1)	The final safety analysis report need not contain information or analyses submitted to the Commission in connection with the design certification, <i>provided, however</i> , that the final safety analysis report must either include or incorporate by reference the standard design certification final safety analysis report and must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the site characteristics fall within the site parameters specified in the design certification. In addition, the plant specific PRA information must use the PRA information for the design certification and must be updated to account for site-specific design information and any design changes or departures.	See COLA Part 2 (FSAR), Section 1.1 (Introduction), Table 2.0-201 (Comparison of AP1000 DCD Site Parameters and V.C. Summer Nuclear Station, Units 2 and 3), Section 19.59 (PRA Results and Insights)
52.79(d)(2)	The final safety analysis report must demonstrate that the interface requirements established for the design under § 52.47 have been met.	See COLA Part 2 (FSAR), Section 1.8 (Interfaces for Standard Design)
52.79(d)(3)	The final safety analysis report must demonstrate that all requirements and restrictions set forth in the referenced design certification rule, other than those imposed under § 50.36b, must be satisfied by the date of issuance of the combined license. Any requirements and restrictions set forth in the referenced design certification rule that could not be satisfied by the time of issuance of the combined license, must be set forth as terms or conditions of the combined license.	See Below for Requirements in 10 C.F.R. Part 52, Appendix D. Additionally, COLA Part 10 (License Conditions and Inspections, Tests, Analyses, and Acceptance Criteria) identifies proposed license conditions. The staff also provided a draft COL for Summer with SECY-11-0115 (ADAMS Accession No. ML111920134).
52.79(e)	Requirements if the COLA references a Manufacturing License.	Not Applicable

Regulation	Requirement	COLA Location
52.79(f)	Each applicant for a combined license under this subpart shall protect Safeguards Information against unauthorized disclosure in accordance with the requirements in §§ 73.21 and 73.22 of this chapter, as applicable.	Safeguards Information is provided in COLA Part 8 (Safeguards/Security Plans) and is withheld from public disclosure.
52.80(a)	The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations.	See COLA Part 2 (FSAR), Section 14.3 (Certified Design Material); COLA Part 10 (License Conditions and Inspections, Tests, Analyses, and Acceptance Criteria)
52.80(a)(1)	If the application references an early site permit with ITAAC, the early site permit ITAAC must apply to those aspects of the combined license which are approved in the early site permit.	Not Applicable
52.80(a)(2)	If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.	See COLA Part 10 (License Conditions and Inspections, Tests, Analyses, and Acceptance Criteria)
52.80(a)(3)	If the application references an early site permit with ITAAC or a standard design certification or both, the application may include a notification that a required inspection, test, or analysis in the ITAAC has been successfully completed and that the corresponding acceptance criterion has been met. The Federal Register notification required by § 52.85 must indicate that the application includes this notification.	Not Applicable
52.80(b)	An environmental report, either in accordance with 10 CFR 51.50(c) if a limited work authorization under 10 CFR 50.10 is not requested in conjunction with the combined license application, or in accordance with §§ 51.49 and 51.50(c) of this chapter if a limited work authorization is requested in conjunction with the combined license application.	See COLA Part 3 (Environmental Report)
52.80(c)	If the applicant wishes to request that a limited work authorization under 10 CFR 50.10 be issued before issuance of the combined license, the application must include the information otherwise required by 10 CFR 50.10, in accordance with either 10 CFR 2.101(a)(1) through (a)(4), or 10 CFR 2.101(a)(9).	Not Applicable
52.80(d)	A description and plans for implementation of the guidance and strategies intended to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities under the circumstances associated with the loss of large areas of the plant due to explosions or fire as required by § 50.54(hh)(2) of this chapter.	See COLA Part 14 (Mitigative Strategies Description and Plans)
App. D § I	Introduction	No additional requirements to address in COLA.
App. D § II	Definitions	No additional requirements to address in COLA.
App. D § III.A	Scope and Contentions, Section A	No additional requirements to address in COLA.
App. D § III.B	An applicant or licensee referencing this appendix, in accordance with Section IV of this appendix, shall incorporate by reference and comply with the requirements of this	See COLA Part 2 (FSAR); COLA Part 4 (Technical Specifications)

Regulation	Requirement	COLA Location
	appendix, including Tier 1, Tier 2 (including the investment protection short-term availability controls in Section 16.3 of the DCD), and the generic TS except as otherwise provided in this appendix. Conceptual design information in the generic DCD and the evaluation of severe accident mitigation design alternatives in appendix 1B of the generic DCD are not part of this appendix.	
App. D § III.C	Scope and Contentions, Section C	No additional requirements to address in COLA.
App. D § III.D	Scope and Contentions, Section D	No additional requirements to address in COLA.
App. D § III.E	Scope and Contentions, Section E	No additional requirements to address in COLA.
App. D § IV.A	An applicant for a combined license that wishes to reference this appendix shall, in addition to complying with the requirements of 10 CFR 52.77, 52.79, and 52.80, comply with the following requirements:	See Below
App. D § IV.A.1	Incorporate by reference, as part of its application, this appendix.	See COLA Part 1 (Administrative and Financial Information); COLA Part 2 (FSAR); COLA Part 10 (License Conditions and Inspections, Tests, Analyses, and Acceptance Criteria)
App. D § IV.A.2	Include, as part of its application:	See Below
App. D § IV.A.2.a	A plant-specific DCD containing the same type of information and using the same organization and numbering as the generic DCD for the AP1000 design, as modified and supplemented by the applicant's exemptions and departures;	This requirement is generally met, with the departures and exemptions identified in COLA Part 7 (Departures and Exemptions).
App. D § IV.A.2.b	The reports on departures from and updates to the plant-specific DCD required by paragraph X.B of this appendix;	See below for requirements of paragraph X.B
App. D § IV.A.2.c	Plant-specific TS, consisting of the generic and site-specific TS that are required by 10 CFR 50.36 and 50.36a;	See COLA Part 4 (Technical Specifications)
App. D § IV.A.2.d	Information demonstrating compliance with the site parameters and interface requirements;	See COLA Part 2 (FSAR), Table 2.0-201 (Comparison of AP1000 DCD Site Parameters and V.C. Summer Nuclear Station, Units 2 and 3), Section 1.8 (Interfaces for Standard Design)
App. D § IV.A.2.e	Information that addresses the COL action items; and	See COLA Part 2 (FSAR), including Table 1.8-202 (COL Item Tabulation)
App. D § IV.A.2.f	Information required by 10 CFR 52.47(a) that is not within the scope of this appendix.	See COLA Part 2 (FSAR), Section 1.8 (Interfaces for Standard Design)
App. D § IV.A.3	Include, in the plant-specific DCD, the proprietary information and safeguards information referenced in the AP1000 DCD.	See COLA Part 2 (FSAR), Section 1.1 (Introduction), which incorporates the AP1000 DCD, including referenced proprietary information and safeguards information
App. D § IV.B	Additional Requirements and Restrictions, Section B	No additional requirements to address in COLA.
App. D § V	Applicable Regulations	No additional requirements to address in COLA.

Regulation	Requirement	COLA Location
App. D § VI	Issue Resolution	No additional requirements to address in COLA.
App. D § VII	Duration of this Appendix	No additional requirements to address in COLA.
App. D § VIII	Processes for Changes and Departures (Note: Due to its length, the wording of this regulation is not reproduced here, but is incorporated by reference) Section VIII.A provides the processes for Tier 1 information; Section VIII.B provides the processes for Tier 2 information; and Section VIII.C provides the processes for operational requirements.	See COLA Part 2 (FSAR), including Section 13.5 (Operational Programs); Part 4 (Technical Specifications); Part 7 (Departures and Exemptions)
App. D § IX	Inspections, Tests, Analyses and Acceptance Criteria	The ITAAC are provided in COLA Part 10 (License Conditions and Inspections, Tests, Analyses, and Acceptance Criteria). The specific requirements of App. D § IX will be satisfied during fabrication and construction activities.
App. D § X.A	Records 1. The applicant for this appendix shall maintain a copy of the generic DCD that includes all generic changes to Tier 1, Tier 2, and the generic TS and other operational requirements. The applicant shall maintain the proprietary and safeguards information referenced in the generic DCD for the period that this appendix may be referenced, as specified in Section VII of this appendix. 2. An applicant or licensee who references this appendix shall maintain the plant-specific DCD to accurately reflect both generic changes to the generic DCD and plant-specific departures made under Section VIII of this appendix throughout the period of application and for the term of the license (including any period of renewal). 3. An applicant or licensee who references this appendix shall prepare and maintain written evaluations which provide the bases for the determinations required by Section VIII of this appendix. These evaluations must be retained throughout the period of application and for the term of the license (including any period of renewal).	Requirement 1 only applies to the DCD Applicant, not a COLA applicant. For Requirement 2, COLA Part 2 (FSAR) identifies departures from the DCD. For requirement 3, see COLA Part 7 (Departures and Exemptions). Additionally, record-keeping requirements are addressed in COLA Part 2 (FSAR), Section 13.5 (Operational Programs), and in COLA Part 13 (QAPD).
App. D § X.B	Reporting 1. An applicant or licensee who references this appendix shall submit a report to the NRC containing a brief description of any plant-specific departures from the DCD, including a summary of the evaluation of each. This report must be filed in accordance with the filing requirements applicable to reports in 10 CFR 52.3. 2. An applicant or licensee who references this appendix shall submit updates to its DCD, which reflect the generic changes to and plant-specific departures from the generic DCD made under Section VIII of this appendix. These updates must be filed under the filing requirements applicable to final safety analysis report updates in 10 CFR 52.3 and 50.71(e). 3. The reports and updates required by paragraphs X.B.1 and X.B.2 must be submitted as follows: a. On the date that an application for a license referencing this appendix is submitted,	The requirements that are applicable to a COLA applicant were met by SCE&G's submission of the COLA itself, and in particular COLA Part 2 (FSAR) and Part 7 (Departures and Exemptions). SCE&G submitted Revision 0 of the COLA to the NRC on March 27, 2008, Revision 1 on July 30, 2009, Revision 2 on January 28, 2010, Revision 3 on August 25, 2010, Revision 4 on February 7, 2011, and Revision 5 on June 28, 2011. SCE&G submitted an additional departures report on April 23, 2009.

Regulation	Requirement	COLA Location
	the application must include the report and any updates to the generic DCD. b. During the interval from the date of application for a license to the date the Commission makes its findings required by 10 CFR 52.103(g), the report must be submitted semi-annually. Updates to the plant-specific DCD must be submitted annually and may be submitted along with amendments to the application. c. After the Commission makes the finding required by 10 CFR 52.103(g), the reports and updates to the plant-specific DCD must be submitted, along with updates to the site-specific portion of the final safety analysis report for the facility, at the intervals required by 10 CFR 50.59(d)(2) and 50.71(e)(4), respectively, or at shorter intervals as specified in the license.	

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