



Nuclear Regulatory Commission
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November 1, 2011

Chairman Gregory B. Jaczko
 Commissioner Kristine L. Svinicki
 Commissioner George Apostolakis
 Commissioner William D. Magwood, IV
 Commissioner William C. Ostendorff

In the matter of
 SOUTH CAROLINA ELECTRIC AND GAS COMPANY
 (Virgil C. Summer Nuclear Station, Units 2 and 3)
Docket Nos. 52-027 and 52-028

Dear Chairman and Commissioners:

Subsequent to the mandatory hearing held on October 12-13, 2011, the NRC staff has determined that three clarifications are necessary to statements in two documents provided to the Commission as part of the hearing record. These clarifications are specified in Enclosure 1 to this letter. The first item revises three sentences in Section 9.2 of the Final Safety Evaluation Report (FSER) to clarify which portions of three systems discussed in the COL application (the potable water system, the sanitary drain system, and the wastewater system) are nonsafety-related. The second clarification removes Table 3.8-1 "Waterproof Membrane ITAAC [Inspections, Tests, Analysis and Inspection Criteria]" from Appendix A of the FSER because that ITAAC was inadvertently included in Appendix A. The third item clarifies the text of license condition 2.D.(10)(e).2 in the draft COL referenced in SECY-11-0115, to make it consistent with the Final Safety Analysis Report and the FSER's evaluation with respect to the specific areas of the plant in which fire protection measures are required to be implemented before receipt of fuel onsite. The applicant has indicated that it has no objection to these revisions.

Respectfully submitted,

/Signed (electronically) by/
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Dated at Rockville, Maryland
 this 1st Day of November 2011

Enclosures: Enclosure 1: NRC Staff Clarifications to the Mandatory Hearing Record

Enclosure 1

NRC Staff Clarifications to the Mandatory Hearing Record

NRC Staff Clarifications to the Mandatory Hearing Record

The NRC staff has identified three clarifications to the Summer COL mandatory hearing record, which are described below.

1. FSER Section 9.2

The staff intends to revise three sentences in Section 9.2 of the “Final Safety Evaluation Report for Combined Licenses for Virgil C. Summer Nuclear Station, Units 2 and 3” (August 2011) (ADAMS Accession No. ML110450305) (FSER) to clarify which portions of three systems discussed in the COL application (the potable water system, the sanitary drain system, and the wastewater system) are nonsafety-related. Although the FSER states that these systems are nonsafety-related, each system does have a small portion that is safety-related; however, the safety-related portion is within the scope of the AP1000 design control document (DCD) and was reviewed and approved as part of the AP1000 design certification. The portion of each system that is addressed in the COL application is entirely nonsafety-related. The FSER text is being revised to clarify this, and the staff will include these revisions when the FSER is published as a NUREG.

The portions of these three systems described in the AP1000 DCD that are safety-related are:

Potable Water System

- The potable water system has no safety-related functions other than to prevent in-leakage into the main control room envelope during main control room emergency habitability system (VES) operation. A loop seal in the safety-related PWS piping that penetrates the main control room envelope boundary prevents in-leakage into the main control room envelope.

Sanitary Drain System

- The sanitary drainage system has no safety-related function other than main control room envelope isolation. Redundant safety-related isolation valves are provided in the vent line penetrating the main control room. Therefore, there are no single active failures that would prevent isolation of the main control room envelope.

Wastewater System

- The waste water system (WWS) has no safety-related function other than main control room envelope isolation. A normally closed safety-related isolation valve is provided in the drain line penetrating the main control room. The drain line is safety related up to the isolation valve to ensure that the main control room habitability pressure boundary is maintained.

The textual clarifications are to the FSER sections described below, with the additions and deletions indicated in red and in strikeout format, respectively.

SER Section 9.2.5.1

The potable water system (PWS) supplies clean water from the raw water system (RWS) for domestic use and human consumption. **The portion of the PWS specified in the COL application is nonsafety-related and** ~~This is a nonsafety system, which~~ includes design provisions for controlling the release of water containing radioactive material and preventing contamination of the PWS.

SER Section 9.2.6.1

The **portion of the sanitary drain system specified in the COL application** is a nonsafety-related system that ~~it~~ collects sanitary wastes from plant restrooms and locker room facilities. The system design ensures that there is no possibility for radioactive contamination of the sanitary drains.

SER Section 9.2.9.1

The **portion of the waste water system (WWS) specified in the COL application** is a nonsafety-related. ~~The system that~~ collects and processes the waste water from the equipment and floor drains in the nonradioactive building areas during plant operations and outages. The waste water from the turbine building sumps flows to a waste water retention basin, if required, for settling of suspended solids and treatment before discharge. The wastewater retention basin transfer pumps discharge the basin effluent to the blowdown sump prior to discharge to the Parr Reservoir via the outfall piping. The design of the system precludes inadvertent discharge of radioactively contaminated drainage.

2. Appendix A of the FSER

In Appendix A of the FSER, the Staff inadvertently included Table 3.8-1 "Waterproof Membrane ITAAC." As described in the Staff's responses to the Commission's Pre-Hearing Questions, this ITAAC is unnecessary for Summer. See NRC000007 at 9. Therefore, the Staff plans to remove Table 3.8-1 from Appendix A of the FSER. As indicated by the fact that this ITAAC was not discussed in Chapter 3 of the FSER and was not included in the draft COL attached to SECY-11-0115, its inclusion in Appendix A of the FSER was merely a drafting error.

3. License condition 2.D.(10)(e).2

In the Summer draft combined license (ML111920134), referenced in 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)), license condition 2.D.(10)(e).2 is revised as follows:

2. The fire protection measures in accordance with RG 1.189 for ~~new fuel storage area areas containing new fuel~~ (including adjacent fire areas ~~where a fire that could affect the new fuel storage area~~) implemented before receipt of fuel onsite;

These changes are necessary to make the condition consistent with the applicant's Final Safety Analysis Report (FSAR) and the staff evaluation in the FSER. The revised license condition language more clearly encompasses the areas of the plant within which new fuel may be stored or transported as indicated in the FSAR and in which the FSER concluded that fire protection measures are required to be implemented before receipt of fuel onsite.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)
)
SOUTH CAROLINA ELECTRIC AND GAS)
COMPANY)
) Docket Nos. 52-057 and 52-028
(Virgil C. Summer Nuclear Station)
Units 2 and 3)

CERTIFICATE OF SERVICE

I hereby certify that copies of the "NRC Staff Letter Providing Clarifications to the Mandatory Hearing Record" have been served upon the following persons by Electronic Information Exchange this 1st day of November, 2011:

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