



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

March 20, 2012

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 1, ISSUANCE OF
AMENDMENT RELOCATING ADMINISTRATIVE CONTROLS RELATED TO
QUALITY ASSURANCE (TAC NO. ME5899)

Dear Mr. Gatlin:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 188 to Renewed Facility Operating License No. NPF-12 for the Virgil C. Summer Nuclear Station, Unit 1 (VCSNS), in response to your letters dated March 18, as supplemented August 30 and November 10, 2011 and February 28, 2012. This amendment relocates several requirements of the Administrative Controls of the VCSNS Technical Specification (TS), to the Quality Assurance Program Description (QAPD). The NRC staff's review of your proposed revision to the QAPD is addressed by separate correspondence.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's Biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink that reads "Robert Martin".

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

Enclosures:

1. Amendment No. 188 to NPF-12
2. Safety Evaluation

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

SOUTH CAROLINA ELECTRIC & GAS COMPANY

SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

DOCKET NO. 50-395

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 188
Renewed License No. NPF-12

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by South Carolina Electric & Gas Company (the licensee), dated March 18, as supplemented August 30 and November 10, 2011, and February 28, 2012, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-12 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 188 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. South Carolina Electric & Gas Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective as of its date of issuance and shall be implemented within 180 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Nancy Salgado, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-12
and the Technical Specifications

Date of Issuance: March 20, 2012

ATTACHMENT TO LICENSE AMENDMENT NO. 188
TO RENEWED FACILITY OPERATING LICENSE NO. NPF-12
DOCKET NO. 50-395

Replace the following pages of the License and Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

License

License No. NPF-12, page 3

TS
XVIII
XIX
XX
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Insert Pages

License

License No. NPF-12, page 3

TS
XVIII

6-4

6-10
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6-19

- (3) SCE&G, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as amended through Amendment No. 33;
- (4) SCE&G, pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed neutron sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) SCE&G, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus of components; and
- (6) SCE&G, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed license shall be deemed to contain, and is subject to, the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

SCE&G is authorized to operate the facility at reactor core power levels not in excess of 2900 megawatts thermal in accordance with the conditions specified herein and in Attachment 1 to this renewed license. The preoccupation tests, startup tests and other items identified in Attachment 1 to this renewed license shall be completed as specified. Attachment 1 is hereby incorporated into this renewed license.

(2) Technical Specifications and Environmental Protection Plan

The technical specifications contained in Appendix A, as revised through Amendment No. 188 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. South Carolina Electric & Gas Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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ADMINISTRATIVE CONTROLS

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ADMINISTRATIVE CONTROLS

6.5 DELETED

6.6 NOT USED

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President, Nuclear Operations and the NSRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PSRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRC and the Vice President, Nuclear Operations within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Security Plan.
- e. Emergency Plan.
- f. Fire Protection Program.
- g. PROCESS CONTROL PROGRAM.
- h. OFFSITE DOSE CALCULATION MANUAL.
- i. Effluent and environmental monitoring program using the guidance in Regulatory Guide 4.15, Revision 1, February 1979.

6.8.2 DELETED

6.8.3 NOT USED.

6.8.4 The following programs shall be established, implemented and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the chemical and volume control, letdown, safety injection, residual heat removal, nuclear sampling, liquid radwaste handling, gas radwaste handling and reactor building spray system. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and
- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

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SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Office of Inspection and Enforcement Regional Office within the time period specified for each report.

6.10 DELETED

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREAS

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr* but less than 1000 mrem/hr* shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Health Physics personnel or individuals escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned duties, provided they otherwise comply with approved radiation protection procedures for entry into high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the RWP.

* Measurement made at 30 cm (12 in.) from the radiation source or from any surface penetrated by the radiation.

ADMINISTRATIVE CONTROLS

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr* but less than 500 rads/hr** shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the duty Shift Supervisor and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area. The maximum allowable stay time for individuals in that area shall be established prior to entry. In lieu of the stay time specification of the RWP, direct or remote continuous surveillance (such as closed circuit TV cameras) shall be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

For individual areas accessible to personnel with radiation levels greater than 1000 mrem/hr* but less than 500 rads/hr** that are located within larger areas (such as PWR containment) where no enclosure can be reasonably constructed around the individual areas, then those areas shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained for the duration of the Unit Operating License. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s); and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the PSRC and approval of the General Manager, Nuclear Plant Operations.

* Measurement made at 30 cm (12 in.) from the radiation source or from any surface penetrated by the radiation.

** Measurement made at 1 meter from the radiation source or from any surface penetrated by the radiation.

ADMINISTRATIVE CONTROLS

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained for the duration of the Unit Operating License. This documentation shall contain:
 - 1) Sufficient information to support the change together with appropriate analyses or evaluations justifying the change(s); and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose or setpoint calculations.
- b. Shall become effective after review and acceptance by the PSRC and the approval of the General Manager, Nuclear Plant Operations.
- c. Shall be submitted to the Commission in the form of a complete legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO

AMENDMENT NO. 188 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-12

SOUTH CAROLINA ELECTRIC & GAS COMPANY

SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

VIRGIL C. SUMMER NUCLEAR STATION, UNIT 1

DOCKET NO. 50-395

1.0 INTRODUCTION

By letter dated March 18, 2011, as supplemented August 30 and November 10, 2011 and February 28, 2012 (References 1 – 4), South Carolina Electric & Gas Company (SCE&G, the licensee), submitted a request for changes to the Virgil C. Summer Nuclear Station (VCSNS), Unit 1 Technical Specifications (TS) to relocate several requirements of the Administrative Controls of the VCSNS TS to the Quality Assurance Program Description (QAPD). The TS affected by the application are as follows:

- INDEX in the Table of Contents
- TS 6.5.1 Plant Safety Review Committee
- TS 6.5.2 Nuclear Safety Review Committee
- TS 6.5.3 Technical Review and Control
- TS 6.8.1 Procedures and Programs
- TS 6.10 Record Retention
- TS 6.13.2 Changes to the Process Control Program
- TS 6.14.2 Changes to the Offsite Dose Calculation Manual

SCE&G's submittals also proposed a revision to the QAPD for Nuclear Regulatory Commission (NRC) staff (staff) review and approval in accordance with the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Section 50.54(a)(4). That proposal is being addressed by separate correspondence.

The letters of August 30 and November 10, 2011 and February 28, 2012, did not change the conclusions of the No Significant Hazards Determination that was published in the Federal Register on July 12, 2011 (76 FR 40940).

2.0 REGULATORY EVALUATION

The Commission's regulatory requirements related to QA programs are set forth in Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, 10 CFR 50.34(b)(6)(ii), and 10 CFR 50.54(a). Appendix B establishes QA requirements for the design, construction, and operation of structures, systems, and components (SSCs) of the facility. The pertinent requirements of Appendix B to 10 CFR Part 50 apply to all activities affecting the safety-related functions of those SSCs and include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifications.

Applicable Regulatory Requirements and Guidance

Guidance on the relocation of TS administrative controls related to quality assurance was developed by the NRC staff and was provided to all holders of operating licenses or construction permits for nuclear power reactors by Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995. In the AL, the staff stated the following:

Among U.S. Nuclear Regulatory Commission efforts related to technical specification improvements are the issuance of a revision to 10 CFR 50.36, revisions to the Standard Technical Specifications, some generic communications, and many individual license amendments. The revision of 10 CFR 50.36 included specific criteria for determining those design conditions that warrant inclusion in technical specifications as limiting conditions for operation. The staff has reviewed and approved many recent amendment requests that involved incorporating parts of the improved Standard Technical Specifications, relocating requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation, and relocating requirements that are controlled directly by regulations and related licensee programs. The relocation of technical specification requirements has included administrative controls as well as limiting conditions for operations and related surveillance requirements.

Increasingly, licensees are requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organizational changes without the need for a license amendment. Recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included moving requirements to licensee controlled documents and programs. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such

other methods can reduce the resources spent by licensees and the U.S. Nuclear Regulatory Commission staff in preparing and reviewing license amendment requests.

The NRC staff then further addressed several specific areas of the TS that could be relocated as will be discussed in the Technical Evaluation section below.

Since the issuance of the standard, NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," which SCE&G is basing its revised QAPD on, the Nuclear Energy Institute (NEI) has issued a topical report providing a generic template for the development of a QAPD. NEI stated that the QAPD includes the methods and administrative control requirements that meet 10 CFR Part 50, Appendix B. The NRC staff issued its safety evaluation as a result of its review of the NEI topical report on July 13, 2010. The approved version of the report, including the NRC's safety evaluation, was issued on August 10, 2010 (Reference 6).

The NRC staff also utilized the guidance in NRC's Standard Review Plan, NUREG-0800, Section 17.5 (Reference 8).

3.0 TECHNICAL EVALUATION

3.1 TS 6.5.1 Plant Safety Review Committee and TS 6.5.2 Nuclear Safety Review Committee

SCE&G proposes to relocate the requirements for its Plant Safety Review Committee (PSRC) and Nuclear Safety Review Committee (NSRC) functions from the TS to its QAPD. SCE&G utilized the guidance in the NEI topical report, NEI 06-14A (Revision 7).

The guidance for development of a QAPD in the NRC-approved reference 6, Part V on independent review activities is consistent with the NRC Standard Review Plan, Section 17.5 (Reference 8). The NRC staff reviewed SCE&G's proposal against Reference 8, Section Z, "Independent Review." The SRP identified two options for an independent review group, an Independent Review Body (IRB), which correlates to SCE&G's PSRC, or an Independent Review Committee (IRC), which correlates to SCE&G's NSRC. SCE&G integrated the SRP provisions for both an IRB and an IRC into its description of its independent review activities in Section 2.2, "Independent Review," of its QAPD (Attachment IV of the March 18, 2011 submittal).

The NRC staff reviewed the transfer of the PSRC and NSRC functions to the QAPD to ensure consistency with current regulatory requirements. The staff noted the following matters in Attachment IV of the LAR, Part V, Section 2.2, "Independent Review."

- a. Section 2.2.d, did not include the time limit of 24 hours for the reporting of violations, deviations and reportable events, as listed in Reference 8, Section Z.I.2.d. The licensee's submittal of August 30, 2011, included the 24 hour limit. This is consistent with the SRP (Reference 8) and is acceptable.
- b. The first sentence of Section 2.2.2 in the March 18, 2011 LAR, read as follows: "The results of supplemented reviews of matters involving the safe operation of the facility are periodically independently reviewed by the PSRC." The staff was concerned that this would not provide for the independent review of PSRC activities as discussed in the SRP.

The licensee's February 28, 2012, submittal revised this sentence as follows: "The results of PSRC reviews of matters involving safe operation of the facility are periodically independently reviewed with a minimum of one such review being conducted yearly." This provides for an independent review of PSRC activities, is consistent with SRP Section Z.I.4, and is acceptable.

- c. QAPD Part V, Sections 2.2.2.d and 2.2.2.e of the March 18, 2011, LAR stated that the PSRC would periodically consider issues they determine warranted special attention and that the PSRC would determine the scheduling and scope of review of the team performing the review. The staff's concern was that these functions should be performed by management, as stated in the SRP. The licensee's February 28, 2012, submittal revised 2.2.2d to state that "Management periodically consider issues they determine warrant special attention, ..." and revised 2.2.2.e to state "Management determines the scheduling and scope of review and the composition of the team performing the review."

The staff finds that the licensee's changes provide for the appropriate management role in independent review activities as described in the above mentioned parts of the QAPD, are consistent with the SRP, and are acceptable.

With the resolution of the matters discussed above, the NRC staff finds that the provisions for independent review to be included in SCE&G's QAPD are consistent with the SRP and with NRC approved topical report (References 8 and 6, respectively) and are therefore acceptable.

3.2 Technical Review and Control, Procedures and Record Retention

SCE&G proposes to delete the requirements for TS 6.5.3, Technical Review and Control, Procedures in TS 6.8.1.a and 6.8.2 and TS 6.10, Record Retention from the TS and relocate them to the QAPD. SCE&G states the following in its application:

The proposed license amendment requests the relocation of several administrative control requirements from TS Section 6.0 to the VCSNS Unit 1 QAPD. This relocation applies to review and audit requirements, procedural review and approval requirements, and the record retention requirements.

As presented in the Background section, above, the NRC staff concluded that the technical specifications not specifically required under 10 CFR 50.36(c)(5), and not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from the administrative controls section of the technical specifications. Consistent with this policy position, the NRC staff issued Administrative Letter AL 95-06, December 12, 1995, identifying TS administrative control requirements that qualify for relocation to licensee quality assurance documents subject to the controls of 10 CFR 50.54(a). Requirements identified by AL 95-06 include review and audit, procedure review and approval, and record retention requirements. The changes proposed herein conform to the NRC staff position presented in AL 95-06 and NEI 06-14A Rev. 7, August 2010.

Revisions to the administrative controls section of the VCSNS Unit 1 TS are currently subject to a no hazards consideration determination pursuant to 10 CFR 50.92. This determination is oriented to design and operational requirements described in the TS.

The administrative controls selected for relocation are considered by the NRC in the above referenced AL 95-06 to be quality assurance requirements and, therefore, qualify for incorporation into documents describing the licensee's quality assurance program. As stated in AL 95-06, 10 CFR 50.54(a) is the appropriate regulation for controlling changes to these and other quality assurance program requirements. Prior NRC approval is required of any changes to the quality assurance program that reduce the commitments in the program description as accepted by the NRC. Accordingly, the proposed license amendment relocating these administrative requirements from the TS to a document subject to the controls of 10 CFR 50.54(a), results in an equivalent level of regulatory authority while providing for a more appropriate change control process.

3.2.1. Technical Review and Control

The licensee's terminology, "Technical Review and Control" and the AL 95-06 terminology "review and audit" are considered to be the same for the purposes of this safety evaluation.

AL 95-06 states, in part, the following:

The technical specification requirements related to review and audit requirements may be relocated to the quality assurance plan. The review of any license amendments related to the relocation of the review and audit functions can be facilitated by licensee references to an existing quality assurance plan commitment or the simultaneous submittal of a revision to the quality assurance plan including the relocated requirements. Commitments may be incorporated into the quality assurance plan by relocating the existing technical specifications intact or by capturing existing structural and administrative requirements by a description of the review and audit organizations and referencing appropriate industry quality assurance standards such as American National Standards Institute standard N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," that explicitly duplicate current technical specification provisions. Subsequent changes to the relocated requirements would be controlled in accordance with 10 CFR 50.54(a).

Review of SCE&G's application shows that the text of TS 6.5.3, Technical Review and Control, as modified editorially to conform to the format of the QAPD and the NRC approved NEI guidance in Reference 5, has been located to Section 2.3 of the VCSNS, Unit 1 QAPD.

The NRC staff finds that SCE&G's discussion of the appropriateness of relocating the Technical Review and Control requirements, as noted above, is accurate and applicable to its LAR of March 18, 2011, as supplemented. The NRC staff finds that there is no significant change in the specification of these requirements, with the exception that any future changes to them will be governed by the requirements of 10 CFR Part 50.54(a) in lieu of the change control requirements for TS. As noted above in the discussion of AL 95-06 and in the SE for reference 5, the NRC staff finds this to be acceptable.

3.2.2 Procedures

3.2.2.a Relocation of Procedures Review Requirement to QAPD

AL 95-06 states, in part, the following;

Existing technical specifications typically contain requirements for the processes related to the review and approval of procedures and changes to procedures. These requirements may be relocated to the quality assurance plan. The review of license amendments related to the relocation of the procedure review processes can be facilitated by licensee references to an existing quality assurance plan commitment or the simultaneous submittal of a revision of the quality assurance plan including a commitment related to the relocated technical specification requirements. As a minimum, the quality assurance plan should contain a commitment to process procedures and procedure changes in accordance with an accepted standard such as ANSI N18.7. Site-specific aspects currently in technical specifications, that do not duplicate ANSI N18.7 provisions, should be relocated to the quality assurance plan. Relocation of the technical specification requirements in this manner, basically relocating them intact to the quality assurance plan, simplifies the U.S. Nuclear Regulatory Commission license amendment review. Any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a).

Review of SCE&G's application shows that the text of TS 6.8.2 on procedures, as modified editorially to conform to the format of the QAPD and the NRC approved NEI guidance in Reference 5, has been relocated to Section 2.3.1.g of the VCSNS, Unit 1 QAPD.

The NRC staff finds that SCE&G's discussion of the appropriateness of relocating this requirement for the review of procedures, as noted above, is accurate and applicable to its LAR of March 18, 2011, as supplemented. The NRC staff finds that there is no significant change in the specification of this requirement, with the exception that any future changes to it will be governed by the requirements of 10 CFR Part 50.54(a) in lieu of the change control requirements for TS. As noted above in the discussion of AL 95-06 and in the SE for reference 5, the NRC staff finds this to be acceptable.

3.2.2.b Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation), Revision 2," (RG 1.33)

SCE&G proposed to revise its prior commitment to RG 1.33 in its March 18, 2011 submittal, by revising TS 6.8.1.a to refer generally to the applicable procedures addressed in the QAPD and by proposing to revise the UFSAR to remove the commitment to RG 1.33. However, in its letters of August 30, 2011 and February 28, 2012, SCE&G withdrew that proposal and clarified that it would continue to meet the provisions of RG 1.33 by withdrawing the proposed changes to TS 6.8.1.a and also by clarifying that RG 1.33 would remain in the UFSAR.

The NRC staff indicated in its SE for Reference 5 (Section 3.2.3.1) that a commitment to RG 1.33 is an acceptable response to this issue for the QAPD. The result of the licensee's withdrawal of the proposed revision to that commitment, as described in the August 30,

2011 and February 28, 2012 letters, reinstates that commitment. On the basis that this results in no change in the licensee's commitment to RG 1.33 and is consistent with the staff's SE for Reference 5, the NRC staff finds this to be acceptable.

3.2.3 TS 6.10, Record Retention

AL 95-06 states, in part, the following:

Technical specification administrative controls typically contain record requirements for particular specifications (such as independent safety engineering group and review and audit functions), as well as a section on general requirements for record retention. These sections may be removed from the technical specifications and placed in the quality assurance plan. The review of any license amendments related to the relocation of requirements related to records or record retention can be facilitated by licensee references to an existing quality assurance plan commitment or by the simultaneous submittal of a revision of the quality assurance plan that incorporates the relocated technical specification requirements. As mentioned above, the review process is less complicated if the requirements are moved intact to the quality assurance plan. For those current technical specification requirements that are explicitly duplicated in accepted industry standards, reference to those standards is sufficient. Any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a).

Review of SCE&G's application shows that the text of TS 6.10 on record retention, as modified editorially to conform to the format of the QAPD and the NRC approved NEI guidance in Reference 5, has been located to Section 2.4 of the VCSNS, Unit 1 QAPD. Also, in response to staff review, SCE&G stated in Reference 2, the QAPD will be revised such that both the group of records to be retained for at least five years and those to be retained for the duration of the unit operating license will be retained for the duration of the operating license.

The NRC staff finds that SCE&G's discussion of the appropriateness of relocating this requirement for record retention, as noted above, is accurate and applicable to its LAR of March 18, 2011, as supplemented. The NRC staff finds that there is no reduction in this requirement, with the exception that any future changes to it will be governed by the requirements of 10 CFR Part 50.54(a) in lieu of the change control requirements for TS. As noted above in the discussion of AL 95-06 and in the SE for reference 5, the NRC staff finds this to be acceptable.

3.3 TS 6.13, Process Control Program, and TS 6.14, Offsite Dose Calculation Manual

Editorial changes were made necessary by the deletion of the former TS Section 6.10. Previously, TS 6.13.2 required that changes to the process control program "Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2." With the deletion of TS 6.10.2, this has been changed to require the records to be retained for the duration of the unit operating license. Since that is the same record retention requirement that was previously included in TS 6.10, there is, in effect no change in the requirement of TS 6.13.2, and accordingly this change is acceptable to the NRC staff. A similar change, also made to TS 6.14.2

due to the deletion of TS 6.1.2, is also acceptable to the NRC staff, because there is, in effect, no change in the requirement of TS 6.14.2.

3.4 Summary

On the basis of the above discussions, the staff concludes that the administrative controls in TS discussed above may be relocated from the TSs to the QAPD and that the proposed amendment to the TS is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the South Carolina State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

References

1. Letter, T.D. Gatlin, SCE&G to the NRC, submitting license amendment request (LAR) to relocate administrative control requirements related to quality assurance and submittal of Quality Assurance Program Description (QAPD)," March 18, 2011 (ADAMS No. ML110810688).
2. Letter, T.D. Gatlin, SCE&G to the NRC, responding to request for additional information, August 30, 2011 (ADAMS No. ML11244A186).
3. Letter, T.D. Gatlin, SCE&G, to the NRC, revising the format of TS pages, November 10, 2011, ADAMS ML11320A132.
4. Letter, T.D. Gatlin, SCE&G, to the NRC, providing additional information , February 28, 2012, ADAMS ML12062A111.
5. S. Coffin, NRC, letter to NEI, Final Safety Evaluation for NEI 06-04, "Quality Assurance Program Description," dated April 25, 2007, ML070510300.

6. Letter, R. J. Bell, NEI, dated August 10, 2010, transmitting report NEI 06-14A (revision 7) (ML102370299) and its associated NRC safety evaluation, dated July 13, 2010, ML101800497.
7. NRC Administrative Letter 95-06, Relocation of Technical Specification Administrative Controls Related to Quality Assurance, December 12, 1995.
8. NRC Standard Review Plan, NUREG-0800, Section 17.5, Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants, DRAFT Rev. 0, January 2006.

Principal Contributor: Robert E. Martin

Date: March 20, 2012

March 20, 2012

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 1, ISSUANCE OF
AMENDMENT RELOCATING ADMINISTRATIVE CONTROLS RELATED TO
QUALITY ASSURANCE (TAC NO. ME5899)

Dear Mr. Gatlin:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 188 to Renewed Facility Operating License No. NPF-12 for the Virgil C. Summer Nuclear Station, Unit 1 (VCSNS), in response to your letters dated March 18, as supplemented August 30 and November 10, 2011 and February 28, 2012. This amendment relocates several requirements of the Administrative Controls of the VCSNS Technical Specification (TS), to the Quality Assurance Program Description (QAPD). The NRC staff's review of your proposed revision to the QAPD is addressed by separate correspondence.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's Biweekly *Federal Register* notice.

Sincerely,

/RA/

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

Enclosures:

1. Amendment No. 188 to NPF-12
2. Safety Evaluation

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DATE	03/19/12	03/20/12	03/20/12	

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