



Ronald A. Jones
Vice President
New Nuclear Operations

October 22, 2012
NND-12-0526

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Attention: Document Control Desk

Subject: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Combined License (COL) Numbers NPF-93 and NPF-94 - Docket Numbers 52-027 and 52-028, Initial status report pursuant to license condition 2.D(13) "Mitigation Strategies for Beyond Design Basis External Events"

References: (1) COL NPF-93 and NPF-94
(2) Nuclear Regulatory Commission (NRC) Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"
(3) Nuclear Energy Institute (NEI) 12-06 "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide"

On March 30, 2012 the NRC issued Combined Operating Licenses, Reference 1, to South Carolina Electric & Gas Company (SCE&G). Reference 1 was immediately effective upon issuance and directed SCE&G pursuant to Section 2.D(13) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool capabilities in the event of a beyond-design-basis external event.

Reference 1 requires submission of an initial status report within 60 days following issuance of the Interim Staff Guidance, Reference 2, which was issued August 29th, 2012. The purpose of this letter is to provide the initial status report pursuant to Section 2.D(13)(f)(4) of Reference 1. This initial report confirms SCE&G has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event.

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Major activities in process during this reporting period:

- Portable FLEX equipment for VCSNS Units 2&3 will be located at the Regional Response Center. No portable equipment has been ordered at this time for VCSNS Units 2&3.
- A site-specific evaluation is in progress to establish the coping capabilities as defined in Reference 3.
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next 6 months:

- Development of the overall Integrated Plan

Technical difficulties encountered that could affect the ability to provide the licensee's August 29th, 2013 Integrated Plan submittal:

- None at this time

Project milestones schedule through completion of installation and testing:

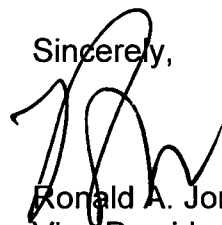
- A project milestones schedule will be provided with the overall Integrated Plan.
- Implementation of license condition 2.D(13) will be completed for VCSNS Unit 2 prior to initial fuel load.
- Implementation of license condition 2.D(13) will be completed for VCSNS Unit 3 prior to initial fuel load.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Alfred M. Paglia by telephone at 803-941-9876, or by email at apaglia@scana.com.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22nd day of October, 2012.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

DK/RBC/dk

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