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NND-13-0114
10 CFR 50.90
10 CFR 52.63

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

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Combined License Nos. NPF-93 and NPF-94
Docket Nos. 52-027 & 52-028

Subject: LAR 13-03 Request for License Amendment and Exemption: Turbine
Building Eccentric and Concentric Bracing Supplement 1

On February 7, 2012, in accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas (SCE&G), requested an amendment to the combined licenses (COLs) for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 (License Numbers NPF-93 and NPF-94, respectively). This amendment request proposed to depart from approved Design Control Document (DCD) Tier 2 material that has been previously incorporated into the VCSNS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) and the associated certified Tier 1 material that is involved with this Tier 2 material, and to revise the associated material that has been included in Appendix C of the VCSNS Units 2 and 3 COLs. Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule was also requested for those plant-specific DCD Tier 1 material departures.

SCE&G is revising the Section 4.3, Significant Hazards Consideration, contained in Enclosure 1 of the license amendment request to correct a deficiency identified in the original submittal. The revised section is contained in Enclosure 1 of this letter.

In accordance with 10 CFR 50.91, SCE&G is notifying the State of South Carolina of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact me by telephone at (803) 941-9876, or by email at apaglia@scana.com.

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

Executed on this 14 day of February, 2013.

Sincerely,



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New Nuclear Deployment

JIG/AMP/jig

Enclosure 1: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 - Revised
Significant Hazards Consideration

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South Carolina Electric & Gas

NND-13-0114

LAR 13-03 Supplement 1

Enclosure 1

Virgil C. Summer Nuclear Station Units 2 and 3

Revised Significant Hazards Consideration

4.3 Significant Hazards Consideration

The proposed changes would revise the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Combined Licenses to use concentric and eccentric braced frames in the turbine building main area and modify the applicable design code. The proposed changes involve departures from Tier 2, Tier 1, and COL Appendix C.

An evaluation to determine whether or not a significant hazards consideration is involved with the proposed amendment was completed by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

4.3.1 Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The turbine building bracing design is changed to a mixed bracing system which uses special concentric and eccentric bracing. The turbine building does not contain safety-related systems or components. The main area of the turbine building continues to meet its design function of preventing a turbine building collapse from impairing the integrity of seismic Category I structures, systems, or components. The first bay of the turbine building is designed to prevent the collapse of the main area of the Turbine Building onto the Nuclear Island during a seismic event. The proposed changes do not affect or impact this design capability. Therefore, the response of the safety related systems, structures, and components in the Nuclear Island to earthquakes and postulated accidents are not affected by the bracing of the turbine building. Based on the above, there is no change in the probability of an accident previously evaluated. The activity does not introduce a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that result in significant fuel cladding failures. Accordingly, there is no change in the consequences of an accident previously evaluated.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

4.3.2 Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The turbine building bracing design is changed to a mixed bracing system which uses Special Concentrically Braced Framing (SCBF) and Eccentrically Braced Framing (EBF). The main area of the turbine building continues to meet its design function of preventing a turbine building collapse from impairing the integrity of seismic Category I structures, systems, or components. The design function of the turbine building first bay to provide the intended limitations to a potential collapse onto the nuclear island during a seismic event is retained. The turbine building structure does not involve any accident initiating component and therefore, changes to use SCBF and EBF would not introduce new accident components or faults.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

4.3.3 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

Use of a mixed bracing system and changing the structural code design for the turbine building main area continue to meet the design function of preventing a turbine building collapse from impairing the integrity of seismic Category I Structures, Systems, and Components. In addition, the first bay of the turbine building continues to be designed to seismic Category II requirements to prevent a turbine building collapse from impairing the integrity of the seismic Category I nuclear island structures, systems and components. This portion of the turbine building and its design is unchanged by the proposed amendment. Maintaining the seismic Category II rating for the turbine building first bay, along with continuing to meet the design function for the non-safety, non-seismic design of the turbine building main area preserves the current structural safety margins.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.