



Ronald A. Jones
Vice President
New Nuclear Operations

August 21, 2013
NND-13-0447

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

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: Virgil C. Summer Nuclear Station Units 2 & 3 Overall Integrated Plan with
Regard to Mitigation Strategies for Beyond Design Basis External Events
pursuant to license condition 2.D(13) "Mitigation Strategies for Beyond
Design Basis External Events" of Combined License (COL) Numbers
NPF-93 and NPF-94

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" dated August
29, 2012 (ML12229A174)
(3) Nuclear Energy Institute (NEI) 12-06 "Diverse and Flexible Coping
Strategies (FLEX) Implementation Guide" dated August, 2012
(ML12242A378)

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 License
Condition 2.D(13), to develop, implement, and maintain guidance and strategies
to maintain or restore core cooling, containment, and spent fuel pool capabilities
resulting from a beyond design basis external event.

More specifically, License Condition 2.D(13)(f)3 of Reference 1 requires SCE&G
to submit to the Commission for review an overall integrated plan detailing the
Licensee's approach to compliance within one (1) year after the issuance of
Reference 2, which endorsed Reference 3 with clarifications and exceptions.
This letter is the fulfillment of the requirement identified in License Condition
2.D(13)(f)3.

Enclosure 1 (Proprietary) of this letter is the VCSNS Units 2 & 3 Overall
Integrated Plan for mitigating conditions resulting from a beyond design basis
external event. It is comprised of the Westinghouse AP1000 standard plant

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report APP-GW-GLR-170 titled "AP1000 FLEX Integrated Plan". SCE&G affirms that the entire content of APP-GW-GLR-170 applies to VCSNS Units 2&3 and together with Enclosure 3, the Specific Milestone Schedule, forms the complete Overall Integrated Plan.

Enclosure 1 contains information proprietary to Westinghouse Electric Company LLC, and it is supported by an affidavit (Enclosure 4) signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in of 10 CFR 2.390(b)(4) of the Commission's regulations. Accordingly, it is respectfully requested that the information that is proprietary to Westinghouse (Enclosure 1) be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations.

Enclosure 2 of this letter is the redacted (Non-Proprietary) version of the "AP1000 FLEX Integrated Plan", APP-GW-GLR-171, and should be made public with Enclosure 3 of this letter to form the complete, non-proprietary Overall Integrated Plan.

Enclosure 3 of this letter is the VCSNS Units 2 & 3 Specific Milestone Schedule which includes activity descriptions, status and target dates associated with implementation of the Overall Integrated Plan.

Enclosure 4 is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure, CAW-13-3759, and the accompanying affidavit.

Enclosure 5 is the associated Westinghouse Proprietary Information Notice and Copyright Notice.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-13-3759 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 310, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

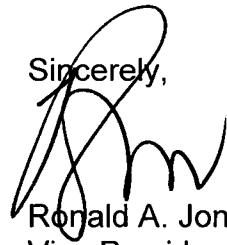
This letter contains no new regulatory commitments.

If you have any questions regarding this submission, 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 21st day of August, 2013.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

DK/RAJ/dk

- Enclosure 1: Virgil C. Summer Nuclear Station Units 2&3 Overall Integrated Plan with Regard to Mitigation Strategies for Beyond Design Basis External Events (**Proprietary; withhold under 10 CFR 2.390**)
- Enclosure 2: Virgil C. Summer Nuclear Station Units 2&3 Overall Integrated Plan with Regard to Mitigation Strategies for Beyond Design Basis External Events (Non-Proprietary)
- Enclosure 3: Virgil C. Summer Nuclear Station Units 2&3 Specific Milestone Schedule
- Enclosure 4: Westinghouse Electric Company, LLC Application for Withholding Information from Public Disclosure and Accompanying Affidavit
- Enclosure 5: Westinghouse Electric Company, LLC Proprietary Information Notice and Copyright Notice

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South Carolina Electric & Gas Company

NND-13-0447

Enclosure 3

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3

Specific Milestone Schedule

Virgil C. Summer Nuclear Station Units 2&3 SPECIFIC MILESTONE SCHEDULE

The following milestone schedule is provided. The dates are planning dates subject to change as design and implementation details are developed. Any changes to the following target dates will be reflected in the subsequent 6 month status reports.

Original Target Date	Activity	Status {Include date changes in this column}
Oct. 2012	Submit 60 Day Status Report	Complete
Aug. 2013	Submit Overall Integrated Plan	Complete
Feb. 2014	Submit 6 Month Status Report	
Aug. 2014	Submit 6 Month Status Report	
Feb. 2015	Submit 6 Month Status Report	
Aug. 2015	Submit 6 Month Status Report	
Oct. 2015	Staffing Analysis Completed	
Dec. 2015	Ensure Operational Procedures Include Necessary Information	
Dec. 2015	Develop Response Plan with RRC (storage plan and procedural guidance for strategy/maintenance)	
Jan. 2016	Initiate Phase 3 Equipment Procurement	
Feb. 2016	Submit 6 Month Status Report	
Aug. 2016	Submit 6 Month Status Report	
Sep. 2016	Training completed for the Phase 3 FLEX strategies	
Sep. 2016	RRC Operational for Summer 2 & 3	
Dec. 2016	Demonstration for Unit 2	
Feb. 2017	Submit 6 Month Status Report & Completion Report For Unit 2	
Aug. 2016	Submit 6 Month Status Report	
Dec. 2016	Demonstration for Unit 3	
Feb. 2017	Submit Completion Report For Unit 3	

No modifications are necessary to the design for Phase 3
 (Phases 1 & 2 are not applicable to AP1000)

Unit 2 - Full compliance prior to Fuel Load

Unit 3 - Full compliance prior to Fuel Load

South Carolina Electric & Gas Company

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Enclosure 4

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3

**Westinghouse Electric Company, LLC Application for Withholding Information
from Public Disclosure and Accompanying Affidavit**



Westinghouse Electric Company
Engineering, Equipment and Major Projects
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USA

U.S. Nuclear Regulatory Commission
Document Control Desk
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Rockville, MD 20852

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e-mail: greshaja@westinghouse.com
Proj letter: DCP_APG_000019

CAW-13-3759

July 17, 2013

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: APP-GW-GLR-170 "AP1000 FLEX Integrated Plan" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-13-3759 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by the AP1000 Owner's Group (APOG).

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference CAW-13-3759 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 310, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'JA Gresham'.

James A. Gresham, Manager,
Regulatory Compliance

Enclosures

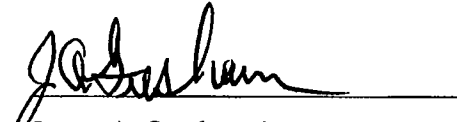
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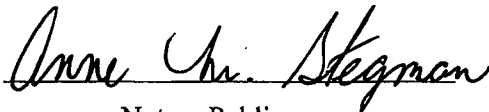
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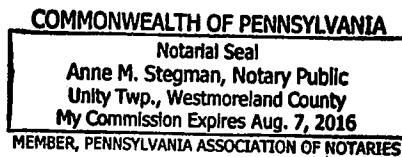
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared James A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:


James A. Gresham, Manager,
Regulatory Compliance

Sworn to and subscribed before me
this 17th day of July 2013


Notary Public



- (1) I am Manager, Regulatory Compliance, in Engineering, Equipment and Major Projects, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in APP-GW-GLR-170 “AP1000 FLEX Integrated Plan” (Proprietary), for submittal to the Commission, being transmitted by APOG Project letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the AP1000 FLEX Integrated Plan (Proprietary), and may be used only for that purpose.

This information is part of that which will enable Westinghouse to provide design details to customers on explicit methods, strategies, connection points, and equipment for off-site support of post 72-hour operations in the event of an extended station blackout at an AP1000 Nuclear Power Plants (NPP).

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for the purpose of supporting development of customer licensing submittals and customer commercial specifications for offsite supporting equipment.
- (b) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

South Carolina Electric & Gas Company

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Enclosure 5

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3

**Westinghouse Electric Company, LLC Proprietary Information Notice and
Copyright Notice**

Proprietary Information Notice

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

Copyright Notice

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.