



Ronald A. Jones
Vice President
New Nuclear Operations

October 3, 2013
NND-13-0533
10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Document Control Desk
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: License Amendment Request (LAR) 13-18: Revision to Human Factors Engineering Discrepancy Resolution Process

Reference: 1. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4 Request for License Amendment: Revision to Human Factors Engineering Discrepancy Resolution Process / GEH-420 (LAR-13-012) Dated April 5, 2013 (Accession Number ML13098A727)

2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4 First Supplement to Pending Requests for License Amendment Changes to APP-OCS-GEH-120, -220, -320 and -420 (LARs 13-010, 13-011, 13-001, and 13-012, respectively) Dated May 21, 2013 (Accession Number ML13144A125)

3. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4 Second Supplement to Request for License Amendment Revision to Human Factors Engineering Discrepancy Resolution Process / GEH-420 (LAR-13-012S2) Dated August 22, 2013 (Accession Number ML13235A175)

4. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4 Third Supplement to Request for License Amendment Revision to Human Factors Engineering Discrepancy Resolution Process / GEH-420 (LAR-13-012S3) Dated September 27, 2013

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 combined licenses (COLs) (License Nos. NPF-93 and NPF-94, respectively). This proposed amendment requests departure from VCSNS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) Tier 2* material incorporated by

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reference into the VCSNS UFSAR by revising document APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process" from Revision B to Revision 1.

A number of changes to the Discrepancy Resolution Process are required in order to align the plan with the latest plant design information. The Discrepancy Resolution Process cannot be conducted as described in Revision B, and plan execution is required to close Inspections, Tests, Analysis and Acceptance Criteria (ITAAC) 3.2.00.01d.

The Description, Technical Evaluation, Regulatory Evaluation (including Significant Hazards Consideration), and Environmental Considerations for the proposed changes from Revision B to Revision 1 of APP-OCS-GEH-420 are contained in Enclosure 1 of this letter. The proposed markups depicting the requested licensing basis document changes are contained in Enclosure 2 of this letter. Enclosure 3 provides the bases for withholding proprietary information, which appears in Enclosures 4 and 6, associated with this amendment request. Enclosure 4 is APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision 1 (Proprietary). Enclosure 5 is a Non-Proprietary version of Enclosure 4, APP-OCS-GEH-422, "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision 1. Enclosure 6 of this letter contains a Red Line Strike-Through comparison of APP-OCS-GEH-420 depicting the changes from Revision B to Revision 1 of the document (Proprietary).

This proposed amendment is consistent with and identical in technical content to the License Amendment Request and its subsequent supplements submitted by Southern Nuclear Operating Company (SNC) identified in References 1-4. The Initial SNC LAR is identified in Reference 1 and supplements 1 through 3 are identified in References 2 through 4 respectively.

As Enclosures 4 and 6 of this letter contain information proprietary to Westinghouse Electric Company, LLC, they are supported by an affidavit 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 paragraph (b)(4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-13-3776 and should be addressed to J.A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

In order to support the VCSNS Unit 2 construction schedule, SCE&G requests NRC staff review and approval of the proposed license amendment by January 2, 2014. This license amendment will be implemented by SCE&G within 30 days of approval.

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 its enclosures to the designated State Official.

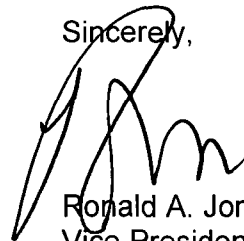
This letter contains no regulatory commitments.

Should you have any questions, please contact 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 3rd day of October, 2013.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

DK/RAJ/dk

- Enclosure 1: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 License Amendment Request: Revision to AP1000 Human Factors Engineering Discrepancy Resolution Process (LAR 13-18)
- Enclosure 2: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Proposed Changes to Licensing Basis Documents (LAR 13-18)
- Enclosure 3: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Westinghouse Authorization Letter CAW-13-3776, its accompanying Affidavit, Proprietary Information Notice, and Copyright Notice (LAR 13-18)
- Enclosure 4: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 APP-OCS-GEH-420 "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision 1 (LAR 13-18) (Proprietary: Withhold Under 10 CFR 2.390)

- Enclosure 5: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 APP-OCS-GEH-422, "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision 1(LAR 13-18)
- Enclosure 6: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 Red Line Strike-Through Comparison of Revision 1 and Revision B of APP-OCS-GEH-420 (LAR 13-18) (Proprietary: Withhold Under 10 CFR 2.390)

c (with enclosures):
Denise McGovern
Ravindra Joshi
David Jaffe
DCRM-EDMS@SCANA.COM

c (without enclosures):
Rahsean Jackson
Victor McCree
Jim Reece
Stephen A. Byrne
Jeffrey B. Archie
Ronald A. Jones
Alvis J. Bynum
Kathryn M. Sutton
April Rice
Julie Ezell
Justin R. Bouknight
Dean Kersey
Amy G. Aughtman
Zach Harper
Brian McIntyre
William E. Hutchins
Curt Castell
Hal Thornberry
Susan E. Jenkins
William M. Cherry
Rhonda O'Banion
Dan Churchman
VCSummer2&3ProjectMail@cbi.com
vcsummer2&3project@westinghouse.com
DCRM-EDMS@SCANA.COM

South Carolina Electric & Gas Company

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Enclosure 1

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

License Amendment Request:

Revision to AP1000 Human Factors Engineering

Discrepancy Resolution Process

(LAR 13-18)

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Enclosure 1

LAR 13-18: Revision to AP1000 Human Factors Engineering Discrepancy Resolution Process

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1. Summary Description

Pursuant to 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) requests an amendment to Combined License (COL) Nos. NPF-93 and NPF-94 for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, respectively. The amendment arises from a proposed revision to a Tier 2* reference document, APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process," from Revision B to Revision 1. The Human Factors Engineering (HFE) discrepancy resolution process is used in support of the verification and validation (V&V) activities performed on human-system interface (HSI) resources and the Operation and Control Centers Systems (OCS). The changes would be reflected in the Updated Final Safety Analysis Report (UFSAR) as a revision to Tier 2* reference document APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process." The proposed changes would revise the COLs in regard to a Tier 2* reference listed in UFSAR Chapter 1, Table 1.6-1 (sheet 20 of 21), and Chapter 18, Section 18.11.2, Reference 6.

In the HFE Discrepancy Resolution Process document, a number of changes need to be made in order to refine the process for capturing and resolving Human Engineering Discrepancies (HEDs) from that process document as described in Revision B. The execution of the discrepancy resolution process is required in order to close Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) 3.2.00.01d.

2. Detailed Description and Technical Evaluation

Overview

The Human Factors Engineering (HFE) discrepancy resolution process is used in support of the verification and validation (V&V) activities performed on human-system interface (HSI) resources and the OCS. Formal V&V activities are an integral part of the overall HFE design process. The AP1000 V&V activities will result in the identification of a number of human engineering discrepancies (HEDs). The HEDs will be prioritized and categorized per APP-OCS-GEH-420. When the HEDs are entered into the SmartPlant Foundation (SPF) Human Factors (HF) tracking system, an HFE Specialist is assigned to ensure the HED is resolved. The tracking system can be used to categorize and sort the categorized HEDs, therefore allowing a cumulative effect analysis to be performed. Each HED is resolved by providing a justification (i.e., an exception) or by changing the HSI design, OCS design, operator training, operating procedures, or staffing aspects. When a HED is resolved using a design change, the cumulative effect analysis is used in conjunction with the design change to determine the best overall resolution.

These discrepancy resolution process activities are used to support the overall final check of the adequacy of the HFE design of the HSI resources and the OCS design. The discrepancy resolution process is part of the overall HFE V&V activities performed against the final configuration and control documentation, simulator, or installed system.

A license amendment is necessary because a Tier 2* reference document, APP-OCS-GEH-420, is being revised. The existing document is Revision B; the new document will be Revision 1. The proposed changes would revise the COLs in regard to a Tier 2* reference listed in UFSAR Chapter 1, Table 1.6-1 (sheet 20 of 21) and Chapter 18, Section 18.11.2, Reference 6. Subsequent to the NRC approving the AP1000 Design Control Document (DCD), more detailed

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Enclosure 1

LAR 13-18: Revision to AP1000 Human Factors Engineering Discrepancy Resolution Process

information has become available resulting in changes to the details of the implementation of the HED resolution process. This includes administrative, organizational and process changes. No changes were made to the overall scope and methodology. These changes impact the HFE Discrepancy Resolution Process. Changing APP-OCS-GEH-420 does not result in any physical changes to the plant, nor plant operations.

References to other documents

The summary of the proposed changes to APP-OCS-GEH-420 detailed below frequently make reference to other Westinghouse documents. All the Westinghouse documents referenced are proprietary documents and are withheld from the public pursuant to 10 CFR 2.390. Other documents discussed in this license amendment request and referenced by the proposed changes to APP-OCS-GEH-420, while available to support the NRC's review of this license amendment request, are not being submitted for NRC approval. This is because NRC approval is only required for APP-OCS-GEH-420 itself, as it is incorporated by reference as Tier 2* information in the UFSAR.

Tier 2*

UFSAR Chapter 1, Section 1.6, Table 1.6-1 (sheet 20 of 21), Material Referenced, APP-OCS-GEH-420, will be changed from Revision B to Revision 1. This document is a Tier 2* reference.

UFSAR Chapter 18, Section 18.11.2, Reference 6, APP-OCS-GEH-420 will be changed from Revision B to Revision 1. This document is a Tier 2* reference.

Justification for all changes

The changes below share a common licensing justification. That justification is as follows: The proposed changes to APP-OCS-GEH-420 (detailed below) are justified because the proposed changes to APP-OCS-GEH-420 are consistent with the guidance in NUREG-0711, Revision 2, Human Factors Engineering Program Review Model. The proposed changes are intended to better align the HED resolution process with the AP1000 processes. Revision 2 of NUREG-0711 provides guidance for definition and execution of a human factors program. In the development of APP-OCS-GEH-420, Revision 1, the guidance of NUREG-0711, Revision 2 was followed, and APP-OCS-GEH-420, Revision 1 is consistent with NUREG-0711, Revision 2.

1. "Bibliography" is updated for document revision numbers for APP-OCS-GEH-120, APP-OCS-GEH-220, APP-OCS-GEH-320 and APP-OCS-GEH-520. Updated other revision numbers, as required, in-line with current approved documents. NSNP 3.3.3 is changed to WEC 3.3.3 in the Reference section.

Updated document revision numbers for the related HF V&V plan in order for the revision numbers to be consistent throughout the documents.

2. "Glossary of Terms" and Section 2.8, "Verifying HED Solutions," are revised to reflect the changed definition of Independent Verifier and add a new reference. This is a change to be consistent with WEC 3.3.3. The definition change and the addition of a new reference are made to be in conformance with current Westinghouse Electric Company procedures regarding the personnel requirements for design verification activities.

3. Section 2.1, "General Process," Section 2.4, "Human Factors Tracking System," and Section 2.5, "The Analysis of the Cumulative Effects of Priority 1 and Priority 2 HEDs," are revised to change the "HFE design issue tracking database" to the "Human Factors Tracking System" and updated the bibliography to WNA-WI-00207-WAPP, "Human Factors Tracking System Work Instruction," to reflect the instruction used to update the Human Factors (HF) Tracking System. The HF Tracking System is the SmartPlant Foundation (SPF) system used to track HEDs identified during HFE verification and validation activities. This is an administrative change.
4. Section 2.1, "General Process," Section 2.2, "Prioritization," Section 2.6, "Analyzing and Resolving Priority 1 and Priority 2 HEDs," and Section 2.7, "Analyzing and Resolving Priority 3 HEDs," are revised to change "HFE Design Engineer" to "HFE Specialist" in order to align with the current Westinghouse organizational structure.
5. Section 2.1, "General Process," Section 2.6, "Analyzing and Resolving Priority 1 and Priority 2 HEDs," and Section 2.8, "Verifying HED Solutions," are changed to note that HEDs may involve HSI design, OCS, operator training, operating procedures, or staffing and work organization aspects. This is a clarification to reflect that HEDs not only involve design changes but may also result in changes to operating procedures, operator training, and/or staffing and work organization aspects.
6. Section 2.2, "Prioritization," and Section 2.8, "Verifying HED Solutions," are revised to change the "OCS Product Manager" to "Human Factors Manager" in order to align with the current Westinghouse organizational structure.
7. Section 2.6, "Analyzing and Resolving Priority 1 and Priority 2 HEDs," is revised to clarify that the HFE specialist assigns the HEDs to the relevant groups responsible for the design, operator training, operating procedures, and staffing and work organization aspects in order for them to identify the most appropriate HED resolution. The cognizant groups such as design, operator training, operations procedures, or staffing are responsible for resolving the HEDs. This change clarifies that the HFE Specialist is responsible for assigning the HEDs to the relevant group(s) and is not responsible for determining the resolution. The resolution is the responsibility of the cognizant group.
8. Section 2.8, "Verifying HED Solutions," was changed to add a description concerning the mechanism to deal with design and procedure changes post-HED resolution. References to APP-GW-G0Y-002, "AP1000 Configuration Management Plan," and WNA-PC-00005-WAPP, "AP1000 I&C Projects Configuration Management Plan," were added to assess and maintain the validity of the HED resolution results against subsequent changes.

In AP1000, HEDs are identified from HF V&V only. Any issues from the design stage are termed "HF General Items", and tracked via the same formal Human Factors Tracking System, with the same Work Instruction (i.e., WNA-WI-00207-WAPP, Rev. 0, "Human Factors Tracking System Work Instruction"). This tracking system addresses human factors issues that are identified throughout the lifecycle of AP1000. It is just a difference in terminology.

9. There are several other minor editorial changes in sections not expressly listed above. These changes make the document more clear and have no effect on the objectives and scope of the Human Factors Engineering Discrepancy Resolution Process.

Summary

The requested amendment reflects a proposed revision to a Tier 2* reference document, APP-OCS-GEH-420 from Revision B to Revision 1. The proposed revision of this document changes the Discrepancy Resolution Process, and those changes will be reflected in the Updated Final Safety Analysis Report (UFSAR) as a revision to Tier 2* reference document APP-OCS-GEH-420. The proposed changes would revise the COLs in regard to a Tier 2* reference listed in UFSAR Chapter 1, Table 1.6-1 and Chapter 18, Section 18.11.2 by changing the revision number of the APP-OCS-GEH-420 document from Revision B to Revision 1.

As detailed above, the changes to the Discrepancy Resolution Process for the Human Factors Engineering do not adversely affect any design function described in the UFSAR. The new revision of APP-OCS-GEH-420 more accurately reflects how the discrepancy resolution process will be implemented to satisfy Revision 2 of NUREG-0711, "Human Factors Engineering Review Model." The new process continues to be consistent with Revision 2 of NUREG-0711. There is no physical change to the plant itself. For these reasons, the proposed changes to the process are acceptable.

3. Technical Evaluation (Incorporated into Section 2, above)

4. Regulatory Evaluation

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.34 (f)(2)(iii) requires a control room design that reflects state-of-the-art human factors principles. As further examples, 50.34 also requires: a safety parameter display system (SPDS) console, automatic indication of bypassed and operable status of safety systems, and monitoring capability in the control room of a variety of system parameters. The revisions to APP-OCS-GEH-420 do not impact the requirements of 10 CFR 50.34(f)(2)(iii).

10 CFR 55.46 requires a plant-referenced simulator capability. The revisions to APP-OCS-GEH-420 do not impact the requirements of 10 CFR 55.46.

The revisions to the referenced document continue to meet the requirements of 10 CFR 50.34(f)(2)(iii) and 10 CFR 55.46.

4.2 Precedent

No precedent is identified.

4.3 Significant Hazards Consideration Determination

The requested change(s) would revise the Combined Licenses for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, Numbers NPF-93 and NPF-94, respectively, by revising a Tier 2* reference that implements part of the Human Factor Engineering program. There is no physical change to the plant itself.

Since the reference is a Tier 2* reference, changing the technical information contained in the Discrepancy Resolution Process constitutes a Tier 2* change, and NRC approval is required prior to implementation. 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 HFE Discrepancy Resolution Process is used to capture and resolve Human Engineering Discrepancies (HEDs) identified during the Human Factors Engineering (HFE) verification and validation (V&V) activities. These discrepancy resolution process activities are used to support the final check of the adequacy of the HFE design of the Human-System Interface (HSI) resources and the Operation and Control Centers Systems (OCS) design. The discrepancy resolution process activities are performed as part of the V&V activities against the final configuration and control documentation, simulator or installed target system. The changes are to the Discrepancy Resolution Process to clarify the scope and amend the details of the methodology. The Discrepancy Resolution Process does not affect the plant itself. Changing the Discrepancy Resolution Process does not affect prevention and mitigation of abnormal events, e.g., accidents, anticipated operational occurrences, earthquakes, floods and turbine missiles, or their safety or design analyses. No safety-related structure, system, component (SSC) or function is adversely affected. The document revision does not involve nor interface with any SSC accident initiator or initiating sequence of events, and thus the probabilities of the accidents evaluated in the Updated Final Safety Analysis Report (UFSAR) are not affected. Because the changes do not involve any safety-related SSC or function used to mitigate an accident, the consequences of the accidents evaluated in the UFSAR are not affected. Therefore, there is no 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 changes to the Discrepancy Resolution Process information are related to discrepancy resolution of HEDs during the HFE V&V activities on the HSI and the OCS. Therefore, the changes do not affect the safety-related equipment itself, nor do they affect equipment which, if it failed, could initiate an accident or a failure of a fission product barrier. No analysis is adversely affected. No system or design function or equipment qualification will be adversely affected by the changes. This activity will not allow for a new fission product release path, nor will it

result in a new fission product barrier failure mode, nor create a new sequence of events that would result in significant fuel cladding failures. In addition, the changes do not result in a new failure mode, malfunction or sequence of events that could affect safety or safety-related equipment. Therefore, this activity does not create the possibility of a new or different kind of accident than any accident previously evaluated.

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

Response: No

The changes to the Discrepancy Resolution Process affect discrepancy resolution of HEDs during the HFE V&V activities on the HSI and the OCS. Therefore, the changes do not affect the assessments or the plant itself. These changes do not affect the design or operation of safety-related equipment or equipment whose failure could initiate an accident, nor does it adversely interface with safety-related equipment or fission product barriers. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the requested change. Therefore, the changes do 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.

4.4 Conclusion

In conclusion, based on the considerations discussed above, (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 amendment will not be inimical to the common defense and security or to the health and safety of the public. Pursuant to 10 CFR 50.92, the requested change does not involve a significant hazards consideration.

5. Environmental Considerations

The requested change(s) would revise the Combined Licenses (COLs) for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, Numbers NPF-93 and NPF-94, respectively. There is no physical change to the plant itself. The requested amendment reflects a proposed revision to a Tier 2* reference document, APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process," from Revision B to Revision 1. The proposed changes would revise the COLs in regard to a Tier 2* reference listed in UFSAR Chapter 1, Table 1.6-1 (sheet 20 of 21), and Chapter 18, Section 18.11.2, Reference 6.

The HFE discrepancy resolution process is one of several V&V activities performed on HSI resources and the OCS. The proposed changes to the discrepancy resolution process do not directly affect the plant itself nor its operation. The changes to the HFE discrepancy resolution process are needed to support the closure of ITAAC 3.2.00.01d.

The proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.21 and 10 CFR 51.22(c)(9), in that:

- (i) *There is no significant hazards consideration.*

As documented in Section 4.3, Significant Hazards Consideration Determination, of this license amendment request, an evaluation was completed to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment." As mentioned above, the changes affect the resolution process for discrepancies identified during verification and validation activities of the HSI and the OCS. The discrepancy resolution process does not affect the plant itself nor its operation. The significant hazards consideration determined that (1) the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) the proposed amendment does not involve a significant reduction in a margin of safety. Therefore, 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.

- (ii) *There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.*

The proposed amendment changes a Tier 2* reference for APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process." As mentioned above, the proposed changes will not affect how the plant is designed, constructed, or operated, as the changes affect the resolution process for discrepancies identified during verification and validation of the HSI and the OCS. The Discrepancy Resolution Process, including changes, is unrelated to any aspects of plant construction or operation that would introduce any changes to effluent types (e.g., effluents containing chemicals or biocides, sanitary system effluents, and other effluents) or affect any plant radiological or non-radiological effluent release quantities. Furthermore, these changes do not diminish the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, the proposed amendment does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.

- (iii) *There is no significant increase in individual or cumulative occupational radiation exposure.*

The proposed changes to the Tier 2* referenced document is acceptable because it continues to comply with Revision 2 of NUREG-0711. As mentioned above, the proposed changes will not affect how the plant is designed, constructed, or operated, as the changes affect the resolution process for discrepancies identified during verification

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Enclosure 1

LAR 13-18: Revision to AP1000 Human Factors Engineering Discrepancy Resolution Process

and validation of the HSI and the OCS. The Human Factors Engineering Discrepancy Resolution Process does not affect the plant itself nor its operation. Consequently, the changes to the referenced document details of implementation have no effect on individual or cumulative occupational radiation exposure during plant operation. Therefore, the proposed amendment does not involve a significant increase in individual or cumulative occupational radiation exposure.

Based on the above review of the proposed amendment, it has been determined that there are no anticipated construction and operational effects of the proposed amendment involving (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.21 and 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment of the proposed amendment is not required.

6. References

None.

South Carolina Electric & Gas Company

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Enclosure 2

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

Proposed Changes to Licensing Basis Documents

(LAR 13-18)

NND-13-0533
Enclosure 2
LAR 13-18: Proposed Changes to Licensing Basis Documents

UFSAR Tier 2, Chapter 1, Table 1.6-1 (sheet 20 of 21)

Revise the title of Tier 2* Westinghouse Topical Report Number APP-OCS-GEH-420 as shown below.

*AP1000 Human Factors Engineering Discrepancy Resolution Process, Revision ~~B-1~~, Westinghouse Electric Company LLC]**

UFSAR Tier 2, Chapter 18, Section 18.11.2

Revise Tier 2* Reference 6 as shown below.

*APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision ~~B-1~~, Westinghouse Electric Company LLC.]**

South Carolina Electric & Gas Company

NND-13-0533

Enclosure 3

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

**Westinghouse Authorization Letter CAW-13-3776,
its accompanying Affidavit, Proprietary Information Notice, and Copyright Notice**

(LAR 13-18)



Westinghouse Electric Company
Nuclear Power Plants
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066
USA

Document Control Desk
U S Nuclear Regulatory Commission
Washington, DC 20852-2738

Direct tel: 412-374-6206
Direct fax: 724-940-8505
e-mail: sisk1rb@westinghouse.com
Project letter: VSL_VSG_000077

Our ref: CAW-13-3776

August 14, 2013

**APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE**

Subject: Transmittal of APP-OCS-GEH-420 Revision 1, AP1000 Human Factors Engineering Discrepancy Resolution Process (Proprietary) and APP-OCS-GEH-422 Revision 1, AP1000 Human Factors Engineering Discrepancy Resolution Process (Non-Proprietary)

The proprietary information for which withholding is being requested in the above-referenced letter is further identified in the affidavit signed by Westinghouse Electric Company LLC. The affidavit accompanying this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and address 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 **South Carolina Electric & Gas Company**.

Correspondence with respect to the proprietary aspects of this application for withholding or the accompanying affidavit should reference CAW-13-3776 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert B. Sisk'.

Robert B. Sisk
Program Manager APR1400 Licensing Support

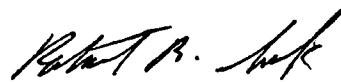
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

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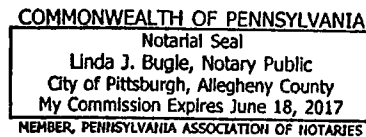
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared **Robert B. Sisk**, 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:



Robert B. Sisk
Program Manager APR1400 Licensing Support

Sworn to and subscribed
before me this 14th day
of August 2013.


Notary Public

- (1) I am Program Manager APR1400 Licensing Support, 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" 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 constitute Westinghouse policy and provide 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 from within the APP-OCS-GEH-420, Revision 1, AP1000 Human Factors Engineering Discrepancy Resolution Process, and may be used only for that purpose.

The information requested to be withheld reveals details of the AP1000 design; sequence and method of construction; and timing and content of inspection and testing. This information was developed and continues to be developed by Westinghouse. The information is part of that which enables Westinghouse to manufacture and deliver products to utilities based on proprietary designs.

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 commercial power reactors without commensurate expenses.

The information requested to be withheld 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.

August 14, 2013

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).

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