



Ronald A. Jones
Vice President
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November 21, 2013
NND-13-0530
10 CFR 50.90
10 CFR 52.63

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

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

Subject: LAR 13-04 Request for License Amendment and Exemption: Reconciliation of Tier 1 Valve Differences Supplement 2

- Reference:
1. South Carolina Electric & Gas Company (SCE&G) Request for License Amendment and Exemption: Reconciliation of Tier 1 Valve Differences, dated February 7, 2013 (NND-13-0066). (Adams Accession Number ML13042A005)
 2. South Carolina Electric & Gas Company (SCE&G) Request for License Amendment and Exemption: Reconciliation of Tier 1 Valve Differences Supplement, dated July 19, 2013 (NND-13-0415). (Adams Accession Number ML13205A148)

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) submitted a request for 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) (Reference 1). The proposed amendment would reconcile various valve descriptions and definitions in Tier 1.

In Reference 2, SCE&G submitted a supplement to the amendment request in Reference 1 in which a new Enclosure (Enclosure 4) was provided and requested to replace Enclosure 1 in Reference 1.

Based on discussions held with the NRC Staff reviewers held in a public conference call on September 5, 2013, SCE&G is providing supplemental information to the amendment request in Reference 1 and the supplement in Reference 2. Specifically, SCE&G is revising the information contained in the Exemption Request Regarding Reconciliation of Tier 1 Valve Differences (Enclosure 2 of Reference 1) to clarify background information in Section 2.0 and correct references to components instead of structures in Section 4.0. SCE&G is also modifying the discussion in Section 4.0 bullet item 5 to clarify why the changes are considered minimal. In addition, SCE&G is revising information contained in Enclosure 4 of Reference 2 to correct a reference to a regulatory requirement and expand the discussion in the significant hazards consideration section.

The revised information to Enclosure 2 of Reference 1 and Enclosure 4 of Reference 2 is provided in this letter and is added as Enclosure 5 of the amendment request.

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The information provided in Enclosures 5 does not change the scope, Technical Evaluation, or conclusions of the Significant Hazards Consideration, in the amendment request in Reference 1 submitted on February 7, 2013.

This letter contains no regulatory commitments.

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 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 November, 2013.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

BB/RAJ/bb

Enclosures:

5. Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 – Supplement 2 to License Amendment Regarding Reconciliation of Tier 1 Valve Differences

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South Carolina Electric & Gas Company

NND-13-0530

Enclosure 5

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

**Supplement 2 to License Amendment Regarding Reconciliation of
Tier 1 Valve Differences**

Note:

**Enclosures 1 through 3 were provided with the original submittal of
LAR 13-04 by South Carolina Electric & Gas Company (Reference 1)**

**Enclosure 4 was provided as a supplement to LAR 13-04 by
South Carolina Electric & Gas Company (Reference 2)**

Enclosure 2 (Exemption Request) Changes

Page 3 of 7 Section 2.0 Background

The last sentence is revised as follows:

An exemption from elements of the AP1000 certification (Tier 1) design information to allow a departure from the design description ~~and ITAAG~~ is requested.

Page 3 of 7 Section 4.0 Justification of Exemption

First paragraph, second sentence is revised as follows:

Since SCE&G has identified changes to the Tier 1 information related to the ~~structures~~ components as a result of further design review activities, an exemption to the certified design information in Tier 1 is needed.

Page 4 of 7 Section 4.0 Justification of Exemption bullet item 2

Second paragraph, first sentence is revised as follows:

These changes will not impact the ability of the ~~structures~~ components to perform their design functions.

Page 6 of 7 Section 4.0 Justification of Exemption bullet item 5

Third sentence is removed and replaced as follows:

~~This exemption request and the associated marked-up tables and figure demonstrate that there is a minimal change from the generic AP1000 DCD, minimizing the reduction in standardization and consequently the safety impact from the reduction.~~ There are no physical changes being proposed to the plant's design. The changes are minor corrections to tables and figures in the generic AP1000 DCD. These changes reconcile information related to various valves in Tier 1 for consistency within the final design. These changes represent a minor reduction in standardization, however since there is no physical change to the plant's design there is no decrease in safety.

Enclosure 4 (LAR) Changes

Page 11 of 15 Section 4.1 Applicable Regulatory Requirements/Criteria

The following regulatory requirement is added as paragraph 1:

10 CFR 52.98(f) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a COL. This activity involves a departure from plant-specific Tier 1 information, and a corresponding change to COL Appendix C, Inspections, Tests, Analyses and Acceptance Criteria information; therefore, this activity requires an amendment to the COL. Accordingly, NRC approval is required prior to making the plant-specific changes in this License Amendment Request.

Page 13 of 15 Section 4.3.1 Significant Hazards Consideration

The following highlighted sentence is inserted between the third and fourth sentences:

The proposed changes do not affect the radioactive material releases used in the accident analyses, thus, the radiological releases in the accident analyses are not affected. **The proposed changes do not affect any postulated non-radioactive accident scenario as evaluated in UFSAR Chapter 15.** Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.