



November 06, 2014  
NND-14-0677  
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: VCSNS Units 2&3 LAR 13-42S2: Supplement to License Amendment  
Request 14-03 Tier 1 Editorial and Consistency Changes

- Reference:
1. NND-14-0227, LAR 13-42 Request for License Amendment and Exemption: Tier 1 Editorial and Consistency Changes, dated May 20, 2014. [ML14140A637]
  2. NND-14-0306, LAR 13-42S1 Request for License Amendment and Exemption: Tier 1 Editorial and Consistency Changes, dated June 03, 2014 [ML14155A257]
  3. Request For Additional Information Letter No. 01 Related To License Amendment Request And Exemption (LAR 13-42), Tier 1 Editorial and Consistency Changes, For The Virgil C. Summer Nuclear Station Units 2 And 3 Combined Licenses, dated October 08, 2014 [ML14281A817]

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) requested an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 combined license numbers NPF-93 and NPF-94, respectively, in Reference 1. The proposed amendment would allow various changes to correct editorial errors in COL Appendix C and promote consistency with the Updated Final Safety Analysis Report (Tier 2 information). Because the proposed changes impact Tier 1 of the Plant-Specific DCD and Appendix C of the COL, this activity has been determined to require prior NRC approval. Also, because the change requires a departure from Tier 1 information, an exemption was requested from the requirements of the Generic DCD Tier 1 pursuant to the provisions of 10 CFR 52.63(b) and 10 CFR 52.7.

On June 03, SCE&G provided a replacement for Enclosure 1 of Reference 1 with Enclosure 1S of Reference 2. Enclosure 1S intended to clarify that the License Amendment Request proposes to depart from COL Appendix C information.

On October 08, 2014, the Nuclear Regulatory Commission (NRC) issued a Request for Additional Information (Reference 3) to SCE&G regarding References 1 and 2. Enclosure 4 of this letter contains SCE&G's response to Reference 3, and Enclosure 5 contains the proposed markup depicting the change requested in Enclosure 4.

Enclosures 1, 2, and 3 are provided in Reference 1, and Enclosure 1S is provided in Reference 2.

The information provided in Enclosures 4 and 5 of this letter does not affect the Technical Evaluation or the conclusions of the Significant Hazards Consideration determination of the LAR provided in Reference 2. Nor do Enclosures 4 and 5 alter the requested approval date provided in Reference 2.

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. Justin Bouknight by telephone at (803) 941-9828, or by email at [justin.bouknight@scana.com](mailto:justin.bouknight@scana.com).

This letter contains no regulatory commitments.

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

Executed on this 6<sup>th</sup> day of November, 2014.

Sincerely,



April R. Rice  
Manager, Nuclear Licensing  
New Nuclear Deployment

MRP/ARR/mrp

Enclosure 4: SCE&G Response to eRAI No. 7694 Related to License Amendment Request 13-42

Enclosure 5: Proposed Changes to Licensing Documents

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**South Carolina Electric & Gas Company (SCE&G)**

**Virgil C. Summer Nuclear Station Units 2 and 3**

**NND-14-0677**

**Enclosure 4**

**SCE&G Response to eRAI No. 7694**

**Related to License Amendment Request 13-42**

**(This enclosure contains 2 pages, including this cover page.)**

**RAI Tracking No. 7663**

**NRC Question 1:**

In its letter dated May 20, 2014, the licensee of V.C. Summer Nuclear Station (VCSNS) Units 2 and 3 submitted License Amendment Request (LAR) 13-42 to request an amendment to the COLs for VCSNS Units 2 and 3 to allow various changes to correct editorial errors in Tier 1 and promote consistency with the Updated Final Safety Analysis Report (UFSAR) Tier 2 information.

The licensee indicates in the “Summary Description” section that for each of the plant-specific Tier 1 changes, the corresponding change to COL Appendix C is also requested. The licensee does not appear to include this request in the “Detailed Description and Technical Evaluation” section. However, this request appears in other sections in LAR 13-42. The staff notes that the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 submitted LAR 14-002 on July 29, 2014, that included the same changes to its COL Appendix C and Tier 1 as well as three additional changes (items t, u and v in the Vogtle LAR 14-002).

The staff found that the V.C. Summer COL Appendix C and Tier 1 incorporated the first two of those additional changes. However, the staff found that a typographical footnote error in Table 3.3-6 had not been corrected in V.C. Summer COL Appendix C. The V.C. Summer licensee is requested to indicate its plans to correct the typographical footnote error in Table 3.3-6 in its COL Appendix C.

**SCE&G Response 1:**

The Tier 1 Table 3.3-6 Design Commitment item 2.c) includes a footnote number 1 that is identified as “Containment isolation devices are addressed in subsection 2.2.1, Containment System.”

The VCSNS COL Appendix C Table 3.3-6 Design Commitment item 2.c) includes a footnote number 2. There is no footnote 2 to the table; however, there is a footnote 1 that is identified as “Containment isolation devices are addressed in subsection 2.2.1, Containment System.” The footnote reference to 2 is incorrect and should be footnote 1 consistent with the Tier 1 information.

Therefore it is proposed to change the 2 to a 1 in the VCSNS COL Appendix C Table 3.3-6. This change is shown in the markup provided in Enclosure 5 of this letter.

**South Carolina Electric & Gas Company**

**NND-14-0677**

**Enclosure 5**

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

**Proposed Changes to Licensing Basis Documents  
(LAR 13-42S2)**

**Insertions Denoted by Green Underline and Deletions by Red Strikethrough**

**(Note that the sheet numbers for the marked-up Table provided in this Enclosure may be changed by the incorporation of this and other departures. These changes are considered editorial and do not require evaluation in this submittal.)**

**(This enclosure contains 2 pages, including this cover page.)**

**COL Appendix C Section 3.3 Buildings**

**Table 3.3-6**

**[VCSNS Unit 2 COL, Appendix C, pg C-424]**

**[VCSNS Unit 3 COL, Appendix C, pg C-424]**

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
		***	***	***
771	3.3.00.02c	2.c) The containment and its penetrations are designed and constructed to ASME Code Section III, Class MC. <del>(a)</del> (1)	See ITAAC Table 2.2.1-3, Items 2.a, 2.b, 3.a, and 3.b.	See ITAAC Table 2.2.1-3, Items 2.a, 2.b, 3.a, and 3.b.
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