

SAFETY EVALUATION BY THE OFFICE OF NEW REACTORS
RELATED TO AN EXEMPTION AND AMENDMENT NO. 23
TO THE COMBINED LICENSE NO. NPF-93
AND LICENSE NO. NPF-94
SOUTH CAROLINA ELECTRIC AND GAS COMPANY
SOUTH CAROLINA PUBLIC SERVICE AUTHORITY
VIRGIL C. SUMMER NUCLEAR STATION UNITS 2 AND 3
DOCKET NOS.: 52-027 AND 52-028

1.0 INTRODUCTION

By letter dated May 20, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14140A637), South Carolina Electric & Gas (SCE&G/licensee) requested that the U.S. Nuclear Regulatory Commission (NRC) amend the combined licenses (COLs) for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, COL Numbers NPF-93 and NPF-94, respectively.

The proposed amendment provides for departure from the Tier 1 material included in Appendix C of each of the VCSNS Units 2 and 3 COLs. The proposed amendment would allow changes to correct editorial errors and promote consistency with the Updated Final Safety Analysis Report (UFSAR) Tier 2 information.

SCE&G has also requested an exemption from the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, Section III.B, "Design Certification Rule for the AP1000 Design, Scope and Contents," to allow a departure from the elements of the certification information in Tier 1 of the generic Design Control Document (DCD).¹

This license amendment request (LAR) 13-42 revises Tier 1 information in COL Appendix C (Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3).

¹ While the licensee describes the requested exemption as being from Section III.B of 10 CFR Part 52, Appendix D, the entirety of the exemption pertains to proposed departures from Tier 1 information in the generic DCD. In the remainder of this evaluation, the NRC will refer to the exemption as an exemption from Tier 1 information to match the language of Section VIII.A.4 of 10 CFR Part 52, Appendix D, which specifically governs the granting of exemptions from Tier 1 information.

In letters dated June 3, November 6, and November 14, 2014 (ADAMS Accession Nos. ML14155A257, ML14311A614 and ML14325A668, respectively), the licensee provided additional information that supplemented the application. This information did not expand the scope of the application, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on September 2, 2014 (79 FR 52059).

In order to modify UFSAR (the plant-specific DCD) Tier 1 information, the NRC must find the licensee's exemption request included in its submittal for the LAR acceptable. The staff's review of the exemption request as well as the license amendment request is included in this safety evaluation.

2.0 REGULATORY EVALUATION

10 CFR Part 52, Appendix D, Section VIII.A.4 states that exemptions from Tier 1 information are governed by the requirements of 10 CFR 52.63(b)(1) and 10 CFR 52.98(f). It also states that the Commission will deny such a request if the design change causes a significant reduction in the level of plant safety otherwise provided by the design.

10 CFR 52.63(b)(1) allows the licensee to request NRC approval for an exemption from one or more elements of the certification information. The Commission may only grant such a request if it complies with the requirements of 10 CFR 52.7, which in turn points to the requirements listed in 10 CFR 50.12 for specific exemptions, and if the special circumstances present outweigh the potential decrease in safety due to reduced standardization. Therefore, any exemption from the Tier 1 information certified by Appendix D to 10 CFR Part 52 must meet the requirements of 10 CFR 50.12, 52.7 and 52.63(b)(1).

10 CFR 52.98(f) states that any modification to, addition to, or deletion from the terms and conditions of a COL including any modification to, addition to, or deletion from the inspections, tests, analyses, and acceptance criteria (ITAAC) contained in the license is a proposed amendment to the license. Appendix C of COLs NPF-93 and NPF-94 contain information which the licensee is proposing to modify. Therefore, the proposed change requires a license amendment.

3.0 TECHNICAL EVALUATION

3.1 EVALUATION OF EXEMPTION

INTRODUCTION

The regulations in Section III.B of Appendix D to 10 CFR Part 52 require a holder of a COL referencing Appendix D to 10 CFR Part 52 to incorporate by reference and comply with the requirements of Appendix D, including certified information in Tier 1 of the generic AP1000 DCD.

As defined in Section II of Appendix D to 10 CFR Part 52, Tier 1 information includes ITAAC and design descriptions, among other things. Therefore, a licensee referencing Appendix D incorporates by reference all Tier 1 information contained in the generic DCD. The Tier 1 ITAAC and the design descriptions, along with the plant-specific ITAAC, were included in Appendix C of the COL at its issuance. The proposed amendment would allow various changes to correct editorial errors in Tier 1 and promote consistency with the UFSAR Tier 2 information.

The proposed changes impact Tier 1 of the Plant-Specific DCD and Appendix C of the COL. An exemption is needed because Section VIII.A.4 of Appendix D to 10 CFR Part 52 requires a licensee to obtain an exemption to depart from the Tier 1 information of the generic AP1000 DCD.

In summary, the end result of this exemption would be that the licensee can implement modifications to Tier 1 information described and justified in LAR 13-42 if and only if the NRC approves LAR 13-42. This is a permanent exemption limited in scope to the particular Tier 1 information specified.

As stated in Section VIII.A.4 of Appendix D to 10 CFR Part 52, an exemption from Tier 1 information is governed by the requirements of 10 CFR 52.63(b)(1) and 52.98(f). Additionally, the Commission will deny a request for an exemption from Tier 1, if it finds that the design change will result in a significant decrease in the level of safety otherwise provided by the design. Pursuant to 10 CFR 52.63(b)(1), the Commission may, upon application by an applicant or licensee referencing a certified design, grant exemptions from one or more elements of the certification information, so long as the criteria given in 10 CFR 52.7 are met, and that the special circumstances as defined by 10 CFR 52.7 outweigh any potential decrease in safety due to reduced standardization.

Pursuant to 10 CFR 52.7, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 52. 10 CFR 52.7 further states that the Commission's consideration will be governed by 10 CFR 50.12, "Specific exemptions," which states that an exemption may be granted when: (1) the exemptions are authorized by law, will not present an undue risk to public health or safety, and are consistent with the common defense and security; and (2) special circumstances are present. 10 CFR 50.12(a)(2) lists six special circumstances for which an exemption may be granted. It is necessary for one of these special circumstances to be present in order for NRC to consider granting an exemption request. The licensee stated that the requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subsection defines special circumstances as when "[a]pplication of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule." The staff's analysis of each of these findings is presented below.

3.1.1 AUTHORIZED BY LAW

This exemption would allow the licensee to implement approved changes to COL Appendix C Tier 1 Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3. This is a permanent exemption limited in scope to particular Tier 1 information, and subsequent changes to Tier 1 Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3 or any other Tier 1 information, would be subject to the exemption process specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52. As stated above, 10 CFR Part 52, Appendix D, Section VIII.A.4 allows the NRC to grant exemptions from one or more elements of the Tier 1 information. The NRC staff has determined that granting of the licensee's proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, as required by 10 CFR 50.12(a)(1), the exemption is authorized by law.

3.1.2 NO UNDUE RISK TO PUBLIC HEALTH AND SAFETY

The underlying purpose of Appendix D to 10 CFR Part 52 is to ensure that the licensee will construct and operate the plant based on the approved information found in the DCD incorporated by reference into the licensee's licensing basis. The changes do not add, delete, or modify systems or equipment as described in Tier 1 of the AP1000 DCD. These changes will not impact the ability of the structures to perform their design function. Because the changes will not alter the operation of any plant equipment or systems, these changes do not present an undue risk from existing equipment or systems. These changes do not add any new equipment or system interfaces to the current plant design. The description changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures. Accordingly, these changes do not present an undue risk from any new equipment or systems. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that there is no undue risk to the public health and safety.

3.1.3 CONSISTENT WITH COMMON DEFENSE AND SECURITY

The proposed exemption would allow editorial and consistency changes to elements of the plant-specific Tier 1 DCD. This is a permanent exemption limited in scope to particular Tier 1 information. Subsequent changes to Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3; or any other Tier 1 information would be subject to the exemption process in Section VIII.A.4 of Appendix D to 10 CFR Part 52. The change does not alter or impede the design, function, or operation of any plant structures, systems or components (SSCs) associated with the facility's physical or cyber security, and therefore does not affect any plant equipment that is necessary to maintain a safe and secure plant status. In addition, the changes have no impact on plant security or safeguards. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that the common defense and security is not impacted by this exemption.

3.1.4 SPECIAL CIRCUMSTANCES

Special circumstances, in accordance with 10 CFR 50.12(a)(2)(ii), are present whenever application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. The underlying purposes of the Tier 1 information is to ensure that the licensee will safely construct and operate the plant based on the certified information found in the AP1000 DCD, which was incorporated by reference into the licensee's licensing basis. The proposed changes to correct editorial and consistency issues between Tier 1 and Tier 2 maintain the functions of these systems. These changes will enable the licensee to safely construct and operate the AP1000 facility consistent with the design certified by the NRC, by clarifying the information found in Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3. Therefore, because the application of the specified Tier 1 information in this circumstance does not serve

the underlying purpose of the rule, the staff finds that the special circumstances required by 10 CFR 50.12(a)(2)(ii) for the granting of an exemption from the Tier 1 information exist.

3.1.5 SPECIAL CIRCUMSTANCES OUTWEIGH REDUCED STANDARDIZATION

This exemption would allow the implementation of changes to Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3 proposed in the LAR. The design functions of the systems associated with this request will continue to be maintained. Based on this, as required by 10 CFR Part 52.63(b)(1), the staff finds that the special circumstances outweigh the effects the departure has on the standardization of the AP1000 design.

3.1.6 NO SIGNIFICANT REDUCTION IN SAFETY

This exemption would allow the implementation of changes to Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3 proposed in the LAR. The changes for consistency and clarity will not impact the functional capabilities of these components. The proposed changes will not adversely affect the ability of the SSCs to perform their design functions and the level of safety provided by the SSCs is unchanged; therefore, as required by 10 CFR Part 52, Appendix D, Section VIII.A.4, the staff finds that granting the exemption would not result in a significant decrease in the level of safety otherwise provided by the design.

3.2 EVALUATION OF PROPOSED CHANGES

The information presented by the licensee in this LAR was evaluated by NRC staff for its completeness, quality, and clarity. No new technical review of the designated changes proposed to be modified by this LAR was required or performed. This is because the changes to Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3, of Appendix C of the COL, are derived from Tier 2 information, and this Tier 2 information was reviewed during the evaluation of the AP1000 DCD and then incorporated by reference into SCE&G's COL application for VCSNS Units 2 and 3. As part of this license amendment, VCSNS did not request any changes to design information; it merely requested changes to how the design information was described in Tier 1. The following paragraphs describe the staff's approach to review the LAR.

The staff reviewed the proposed changes and determined that the changes do not affect any of the information used or cited in the NRC's safety findings as documented in either the AP1000 DCD Final Safety Evaluation Report (FSER) or the VCSNS Units 2 and 3 COL FSER. The proposed changes to Figures 2.2.4-1, 3.3-1 through 10, 3.3-11A, 3.3-11B, and 3.3-12 through 14; Tables 2.2.2-3, 2.2.3-4, 2.2.3-6, 2.2.4-1, 2.2.4-4, 2.2.5-5, 2.3.2-2, 2.3.6-1, 2.3.6-4, 2.3.10-1, 2.3.10-4, 2.3.14-2, 2.6.3-3, 2.6.3-4, 3.3-1, 3.3-6, 2.1.3-4, 2.5.1-2 and 3.7-2; and Sections 2.6.3 and 3.3, of Appendix C of the COL are to correct inconsistencies or editorial errors. There are no changes to the design, functional capabilities, method for performing a function, design analysis, safety analysis, or UFSAR Tier 2 information involved, and thus, the requested Tier 1 changes do not affect any design functions. The proposed changes do not involve a change to the method of evaluation for establishing design bases or safety analyses.

Tests, experiments and procedures described in the licensing basis were not changed by these departures.

- *Table 2.2.2-3*

The staff verified that the proposed change to the acceptance criteria on Table 2.2.2-3, Item 8.b) of Appendix C of the COL, to correct the acronym for the passive containment cooling ancillary water storage tank, accurately reflects the Tier 2 information depicted in UFSAR Table 6.2.2-1, note 4, and Subsection 9.1.3.4.3, and Tier 1 Sections 1.4 and 2.2.2 and Table 2.2.2-3. These changes do not involve a physical change to the plant or changes to the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency between Tier 1 and Tier 2.

- *Table 2.2.3-4*

The staff verified that the proposed change to the Design Commitment on Table 2.2.3-4, Item 6 of Appendix C of the COL correctly identifies the as-built PXS [Passive Core Cooling System] instead of the incorrect RCS [Reactor Coolant System]. This change is consistent with UFSAR Table 1.7-2 and other references within Tier 1, Table 2.2.3-4.

- *Table 2.2.3-6*

The staff verified that the proposed changes to the tag numbers on Table 2.2.3-6 of Appendix C of the COL correctly list the RCS Wide Range Pressure Sensors tag numbers as “RCS-140A, B, C, D” instead of the incorrect “RCS-191A, B, C, D.” These changes are consistent with both the information in UFSAR Tables 3.11-1 and 3I.6-2, and Tier 1, Tables 2.1.2-1 and 3.7-1.

- *Table 2.2.4-1*

The staff verified the proposed change to the Safety-Related Display indication on Table 2.2.4-1 of Appendix C of the COL to correctly identify the safety-related steam generator (SG) blowdown isolation valves (SGS-PL-V075A and SGS-PL-V075B) and safety-related steam line condensate drain control valves (SGS-PL-V086A and SGS-PL-V086B) to have safety-related remote indication for valve position (“Yes (valve position)”), instead of the incorrect “No.” This proposed change is consistent with the plant design as described in UFSAR Tier 2 Table 3.9-16.

- *Table 2.2.4-4*

The staff verified that the proposed change to the acceptance criteria on Table 2.2.4-4, Item 6 of Appendix C of the COL correctly refers to “SGS” instead of the incorrect “RCS.” This change is consistent with UFSAR Table 1.7-2 and COL Appendix C, Section 2.2.4.

- *Figure 2.2.4-1*

The staff verified that the proposed change to Figure 2.2.4-1 (Sheet 3) of Appendix C of the COL correctly identifies the Main Turbine System (MTS) turbine control valves as “MTS-PL-V002A/B and MTS-PL-V004A/B,” and the turbine stop valves as “MTS-PL-V001A/B and MTS-PL-V003A/B” instead of the incorrect “MSS-PL-V002A/B and MSS-PL-V004A/B” and “MSS-PL-V001A/B and MSS-PL-V003A/B.” Additionally, the proposed change to clarify that

these valves have electro-hydraulic actuators is consistent with UFSAR Tier 2, Table 3.9-16, and Section 10.2.

- *Table 2.2.5-5*

The staff verified that the proposed change to the Inspections, Tests, Analyses Column on Table 2.2.5-5, Item 12 of Appendix C of the COL, to correct the acronym for the Main Control Room from “MRC” to “MCR” is consistent with the information throughout both UFSAR and Tier 1.

- *Table 2.3.2-2*

The staff verified the proposed change to Table 2.3.2-2 of Appendix C of the COL to move Line Number “L073” and its associated “No” in the ASME *Boiler and Pressure Vessel Code* Section III column from the chemical and volume control system (CVS) Return Line from Regenerative Heat Exchanger row to the correct CVS Lines from RC Filters to Regenerative Heat Exchanger row. This change is consistent with the accepted design.

- *Table 2.3.6-1*

The staff verified that the proposed change to Table 2.3.6-1 of Appendix C of the COL to correct the “Qual. for Harsh Envir.” indication to “Yes” for valve RNS-PL-V061 is consistent with UFSAR Table 3.11-1.

- *Table 2.3.6-4*

The staff verified that the proposed change to the Acceptance Criteria Column on Table 2.3.6-4, Item 6 of Appendix C of the COL correctly refers to the as-built RNS [Normal Residual Heat Removal System] instead of the incorrect RCS. This change is consistent with Tier 1 Table 2.3.6-4, Design Commitment Item 6, and COL Appendix C Tier 1, Table 2.3.6-2.

- *Table 2.3.10-1 and 2.3.10-4*

The staff verified that the proposed changes to the format for Liquid Radwaste System containment sump level sensors tag number in Tables 2.3.10-1 and 2.3.10-4 of Appendix C of the COL from “WLS-LT-034, -035 and -036” to “WLS-034, WLS-035 and WLS-036,” are consistent with the definition for Tag Number in Tier 1, Section 1.1.

- *Table 2.3.14-2*

The staff verified that the proposed change to Tier 1, Table 2.3.14-2, Item 3 Design Commitment to correctly state that the condensate storage tank supplies water to the Feedwater System startup feedwater “pumps” instead of to the feedwater “tanks,” is consistent with UFSAR Tier 2, Subsection 9.2.4.1.2; COL Appendix C Tier 1, Table 2.4.1-2, Item 2 Design Commitment; and COL Appendix C Tier 1, Table 2.3.14-2, Item 3 Acceptance Criteria.

- *Table 2.3.14-2*

The staff verified that the proposed change to the Inspections, Test, Analyses column of Tier 1, Table 2.3.14-2, Item 4 correctly states “Inspection will be performed for retrievability of

parameters in the MCR” instead of the incorrect “Inspection will be performed for retrievability or parameters in the MCR.” This change is consistent with the Design Commitment of Table 2.3.14-2, Item 4.

- *Table 2.6.3-3, item 4.i) and Section 2.6.3, item 4.i)*

The staff verified that the change to Tier 1, Table 2.6.3-3, item 4.i and Section 2.6.3, item 4.i to correctly add Section 2.7.1 to the list of subsections that identified Class 1E motor operated valves is consistent with Tier 1, Table 2.7.1-1.

- *Table 2.6.3-4*

The staff verified that the proposed change to Tier 1, Table 2.6.3-4 of Appendix C of the COL to correctly describe the 1E Spare Battery Bank as “Spare 250 Vdc Battery Bank” instead of the incorrect “Spare 125 Vdc Battery Bank,” is consistent with the plant design; Tier 1, Table 2.6.3-1; and UFSAR Subsection 8.3.2.1.1.1.

- *Section 3.3*

The staff verified the proposed change to Tier 1 Section 3.3 of Appendix C of the COL to modify the sentence “The turbine building structure is adjacent to the nuclear island structures consisting of the auxiliary building to the south and the annex building to the south and east,” to correctly state “The turbine building structure is adjacent to the auxiliary building to the south and the annex building to the south and east.” This change is consistent with information in Tier 1, Figures 3.3-1 through 3.3-10; Tier 1, Figure 3.3-14; and UFSAR Figures 1.2-4 through 1.2-16, Figure 3.7.2-12, and Section 1.2.1.6.1.

- *Table 3.3-1*

The staff verified that the change proposed to Tier 1, Table 3.3-1 to delete the line item “N-S Shield Wall on Column line F,” from 4.1 North, and from El. 100'-0" to 117'-6," for the Annex Building Section is consistent with information in the UFSAR Figures 1.2-201, 3.7.2-19 (Sheets 1 and 2), and 12.3-201, 12.3-202, and 12.3-203.

- *Section 3.3, Item 5.c) and Table 3.3-6, Items 2.c) and 5.c)*

The staff verified the proposed change to Tier 1, Section 3.3, item 5.c, and Table 3.3-6, Item 5.c of Appendix C of the COL to correctly refer to Nuclear Island Room “11206” for PXS valve/accumulator Room A instead of the incorrect Nuclear Island Room “11205.” This change is consistent with UFSAR Figure 1.2-6, Table 3.6-2, Table 9A-3, Subsection 3.4.1.2.2.1, and Subsection 9A.3.1.1.3; and Tier 1, Table 2.3.9-3, Item 3.iii), and Table 2.3.10-1. As part of its review, the NRC staff requested in RAI 7694, Question 1, that the licensee address a typographical footnote reference in Table 3.3-6, item 2.c of Appendix C of the COL. In its response, dated November 6, 2014, the licensee provided a proposed correction to the reference from footnote 2 to footnote 1 for containment isolation devices in VCSNS COL Appendix C, Table 3.3-6. The staff finds that the proposed change to VCSNS COL Appendix C, Table 3.3-6 will correct the footnote reference.

- *Miscellaneous typing and spelling corrections*

The staff verified that the typing and spelling corrections listed below do not involve a physical change to the plant or changes to the original design function of the plant.

- In COL Appendix C Tier 1, Table 2.1.3-4, "Figure 2.1.3.2" is proposed to be replaced with "Figure 2.1.3-2."
- In COL Appendix C Tier 1, Table 2.1.3-4 Dimension K, the minus sign "-" is missing from the Acceptable Variation value, thus it is proposed that "+0.20/0.20" be replaced with "+0.20/-0.20"
- In each of COL Appendix C Tier 1, Figures 3.3-1 through -10, Note 1's, "ELEVATERS" is proposed to be replaced with "ELEVATORS."
- In each of COL Appendix C Tier 1, Figures 3.3-1 through -10, Note 3's, "OT" is proposed to be replaced with "OF."
- In each of COL Appendix C Tier 1, Figures 3.3-1, -2, -3, -4, -5, -7, -9 and -10, Note 3's, "DESIDN" is proposed to be replaced with "DESIGN."
- In each of COL Appendix C Tier 1, Figures 3.3-11A and 3.3-11B, Figure 3.3-12 through Figure 3.3-14, Note 2's, "OT" is replaced with "OF," and "DESIDN" is proposed to be replaced with "DESIGN."
- In COL Appendix C Tier 1, Table 2.5.1-2 and Table 3.7-2, "Ignitors" is proposed to be replaced with "Igniters."

All of the above proposed changes do not represent any technical changes to the design, construction, or operation of the plant. No structure, system, component, design function, or analysis as described in the UFSAR is affected.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations in 10 CFR 50.91(b)(2), the South Carolina State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (79 FR 52059, published on September 2, 2014). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

Because the exemption is necessary to allow the changes proposed in the license amendment, and because the exemption does not authorize any activities other than those proposed in the license amendment, the environmental consideration for the exemption is identical to that of the license amendment. Accordingly, the exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the exemption.

6.0 CONCLUSION

The NRC staff has determined that pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52, the exemption (1) is authorized by law, (2) presents no undue risk to the public health and safety, (3) is consistent with the common defense and security, (4) is a special circumstance that outweighs the reduction in standardization, and (5) does not significantly reduce the level of safety at the licensee's facility. Therefore, the staff grants the licensee an exemption from the Tier 1 information specified by the licensee.

The staff has concluded, based on the considerations discussed in Section 3.2 and confirming that these changes do not change an analysis methodology, assumptions, or the design itself, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that 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. Therefore, the staff finds the changes proposed in this license amendment acceptable.

7.0 REFERENCES

1. Request for License Amendment and Exemption 13-42: Tier 1 Editorial and Consistency Changes, letters from South Carolina Electric & Gas, dated May 20, 2013 (ADAMS Accession No. ML14140A637) and June 3, 2014 (ADAMS Accession No. ML14155A257).
2. Summer, Units 1 and 2 [Units 2 and 3] – LAR 13-42S2: Supplement to License Amendment Request 14-03 [13-42] Tier 1 Editorial and Consistency Changes, dated November 6, 2014 (ADAMS Accession No. ML14311A614).
3. Virgil C. Summer, Units 2 and 3 – Supplement to License Amendment Request 13-42 Tier 1 Editorial and Consistency Changes, dated November 20, 2014 (ADAMS Accession No. ML14325A668).
4. Virgil C. Summer Nuclear Station (VCSNS) Updated Final Safety Analysis Report (UFSAR), Revision 2, dated June 26, 2014 (ADAMS Accession No. ML14183B265).
5. AP1000 Design Control Document, Revision 19, dated June 13, 2012 (ADAMS Accession No. ML11171A500).
6. Virgil C. Summer Nuclear Station, Final Safety Evaluation Report, dated August 17, 2011 (ADAMS Accession No. ML110450305).

7. Final Safety Evaluation Report Related to Certification of the AP1000 Standard Plant Design, NUREG-1793, Supplement 2, dated August 5, 2011 (ADAMS Accession No. ML112061231).