



April R. Rice  
Manager, Nuclear Licensing  
New Nuclear Deployment

February 19, 2015  
NND-15-0080

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

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

Subject: South Carolina Electric & Gas Company (SCE&G), VCSNS Units 2&3  
Submittal of Six (6) Month Status Report Regarding Implementation of  
the Overall Integrated Plan for Mitigation Strategies for Beyond Design  
Basis External Events

Reference: 1. Combined Operating License (COL) Numbers NPF-93 and NPF-94  
  
2. 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 Dated August 21, 2013 (Accession Number  
ML13234A519)

On March 30, 2012 the Nuclear Regulatory Commission (NRC) issued Combined  
Operating License numbers NPF-93 and NPF-94 (Reference 1) to SCE&G for the Virgil  
C. Summer Nuclear Station Units 2&3 respectively. License condition 2.D(13) of  
Reference 1 requires SCE&G to develop, implement and maintain guidance and  
strategies to maintain or restore core cooling, containment and spent fuel pool  
capabilities in the event of a beyond-design-basis event.

In August, 2013, pursuant to license condition 2.D(13)(3), SCE&G submitted Reference  
2 to the NRC. This Overall Integrated Plan identified the activities required to fulfill  
license condition 2.D(13) and identified milestones associated with implementation of  
the plan in Enclosure 3.

Pursuant to license condition 2.D(13)(f)(4) of Reference 1, SCE&G hereby submits the  
enclosed six (6) month status report regarding implementation of the Overall Integrated  
Plan.

This letter contains no regulatory commitments.

Document Control Desk  
NND-15-0080  
Page 2 of 3

Should you have any questions, please contact Justin Bouknight, Supervisor, Nuclear Licensing, by telephone at (803) 941-9828, or by email at justin.bouknight@scana.com

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

Executed on this 19<sup>th</sup> day of February, 2015.

Sincerely,



April R. Rice  
Manager, Nuclear Licensing  
New Nuclear Deployment

DK/ARR/dk

Enclosure 1: Six (6) Month Status Report Regarding Implementation of the Overall  
Integrated Plan for Mitigation Strategies for Beyond Design Basis  
External Events

cc : Denise McGovern  
David Jaffe  
Ruth Reyes  
Chandu Patel  
Tom Fredette  
Patrick Donnelly  
Victor McCree  
Jim Reece  
Stephen A. Byrne  
Jeffrey B. Archie  
Ronald A. Jones  
Alvis J. Bynum  
Kathryn M. Sutton  
April Rice  
Justin Bouknight  
Matt Kunkle  
Mory Diane  
Bryan Barwick  
Dean Kersey  
Margaret Felkel  
Cynthia Lanier

Kristin Seibert  
Neil Haggerty  
Joel Hjelseth  
Bill Macecevic  
Pat Young  
Tom Geer  
Michael Frankle  
AJ Marciano  
Sean Burk  
Zach Harper  
Brian McIntyre  
Brian Bedford  
Joseph Cole  
Chuck Baucom  
Curt Castell  
Ken Hollenbach  
Susan E. Jenkins  
William M. Cherry  
Rhonda O'Banion  
VCSummer2&3ProjectMail@cbi.com  
vcsummer2&3project@westinghouse.com  
DCRM-EDMS@SCANA.COM

**South Carolina Electric & Gas Company**

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

**NND-15-0080**

**Enclosure 1**

**Six (6) Month Status Report Regarding Implementation**

**of the**

**Overall Integrated Plan for Mitigation Strategies**

**for Beyond Design Basis External Events**



## Six Month Status Report Regarding Implementation of the Overall Integrated Plan

**1 Introduction**

Virgil C. Summer Nuclear Station Units 2&3 developed an Overall Integrated Plan, Reference 2, documenting the diverse and flexible strategies (FLEX) developed to maintain or restore core cooling, containment and spent fuel pool cooling capabilities following a beyond design basis external event in response to license condition 2.D(13) of Reference 1. The status report in this enclosure provides a six (6) month update of milestone accomplishments since submittal of the Overall Integrated Plan pursuant to license condition 2.D(13)(f)4 of Reference 1.

**2 Milestone Accomplishments**

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since SCE&G submittal of the Overall Integrated Plan, Reference 2, and are current as of February 19, 2015:

- None

**3 Milestone Schedule Status**

The following table provides an update to information contained in Enclosure 3 of the Overall Integrated Plan, Reference 2. It provides the activity status of each item, and whether the expected completion date has changed from that submitted in Reference 2. The dates are planning dates subject to change as design and implementation details are developed, however, any revision to milestone target completion dates does not impact the final implementation date.

Activity	Activity Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct. 2012	Complete	N/A
Submit Overall Integrated Plan	Aug. 2013	Complete	N/A
Submit 6 Month Status Report	Feb. 2014	Complete	N/A
Submit 6 Month Status Report	Aug. 2014	Complete	N/A
Submit 6 Month Status Report	Feb. 2015	Complete	N/A
Submit 6 Month Status Report	Aug. 2015	Not Started	
Staffing Analysis Completed	Oct. 2015	Not Started	Aug. 2017
Ensure Operational Procedures include necessary information	Dec. 2015	Not Started	Jun. 2016
Develop Response Plan with RRC	Dec. 2015	Not Started	Jun. 2016
Initiate Phase 3 Equipment Procurement	Jan. 2016	Not Started	Jun. 2016
Submit 6 Month Status Report	Feb. 2016	Not Started	
Submit 6 Month Status Report	Aug. 2016	Not Started	
Training completed for the Phase 3 FLEX strategies	Sep. 2016	Not Started	Mar. 2018
RRC Operational for V.C. Summer 2&3	Sep. 2016	Not Started	Jan. 2017
Submit 6 Month Status Report	Feb. 2017	Not Started	
Demonstration for Unit 2	Dec. 2016	Not Started	Apr. 2017
Demonstration for Unit 3	Dec. 2016	Not Started	Apr. 2018
Submit Completion Report for Unit 2	Feb. 2017	Not Started	Jul. 2017

NND-15-0080

Enclosure 1

Six Month Status Report Regarding Implementation of the Overall Integrated Plan

Submit 6 Month Status Report	Aug. 2017	Not Started	
Submit 6 Month Status Report	Feb. 2018	Not Started	
Submit Completion Report for Unit 3	Feb. 2017	Not Started	Jul. 2018

Unit 2 - Full compliance prior to fuel load

Unit 3 - Full compliance prior to fuel load

**4 Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 2).

**5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

Virgil C. Summer Nuclear Station Units 2&3 expect to complete implementation of the requirements of license condition 2.D(13) prior to fuel load pursuant to 2.D(13)(f) of Reference 1. No relief/relaxation is required at this time.

**6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

- None.

**7 Potential Draft Safety Evaluation Impacts**

- None.

**8 References**

The following references support the updates to the Overall Integrated Plan described in this enclosure:

1. Combined Operating License (COL) numbers NPF-93 and NPF-94
2. 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 Dated August 21, 2013 (Accession Number ML13234A519)