



Ronald A. Jones
Vice President
New Nuclear Operations

April 21, 2015
NND-15-0241
10 CFR 50.90
10 CFR 52.63

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: Preliminary Amendment Request (PAR) 13-09: Annex and Radwaste Building Changes

- Reference:
1. South Carolina Electric & Gas Company (SCE&G) Request for License Amendment and Exemption LAR 13-09: Annex and Radwaste Building Changes February 27, 2014 (NND-14-0048) (ML14065A022)
 2. Letter from Ravindra G. Joshi (NRC) to Ronald Jones (SCE&G), Virgil C. Summer Nuclear Station Units 2 and 3: Request for Additional Information Letter No. 01 Related to Exemption and License Amendment Request (LAR) 13-09, for Virgil C. Summer Nuclear Station Units 2 and 3: Annex and Radwaste Building Changes (ML14125A297)
 3. South Carolina Electric & Gas Company (SCE&G) Request for License Amendment and Exemption LAR 13-09 S1: Annex and Radwaste Building Changes July 09, 2014 (NND-14-0383) (ML14192A036)
 4. South Carolina Electric & Gas Company (SCE&G) Request for License Amendment and Exemption LAR 13-09 S2: Annex and Radwaste Building Changes September 25, 2014 (NND-14-0572) (ML14268A544)
 5. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4 Preliminary Amendment Request PAR-13-019: Annex Building Column Line Changes May 6, 2014 (ND-14-0690)(ML14126A787)

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) submitted a request for license amendment to the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 combined licenses (COLs) numbers NPF-93 and NPF-94, respectively. The requested amendment (LAR 13-09) and supplements were submitted as indicated in the reference list above, to depart from VCSNS Units 2 and 3 plant-specific Design Control Document (DCD) Tier 1 and Tier 2 material contained within the Updated Final Safety Analysis Report (UFSAR), as well as COL Appendix C material, to modify the annex and radwaste buildings.

SCE&G is submitting a Preliminary Amendment Request, PAR 13-09, to avoid possible construction delays for Unit 2. The determination of whether the NRC has any objection to SCE&G proceeding with the proposed plant licensing basis changes related to the Annex Building identified in the LAR is requested prior to June 21, 2015. Delayed determination regarding this PAR could result in a delay in the construction of the VCSNS Unit 2 Annex Building.

A description of the requested change and the reason for the change are contained in Enclosure 1 to this letter. This PAR has been developed in accordance with guidance provided in Revision 0 – Corrected of NEI 96-07, Appendix C Guideline for Implementation of Change Processes for New NPPs Licensed Under 10 CFR Part 52. The technical scope of this PAR is consistent with the technical scope of the submitted LAR. Section 7 of Enclosure 1 identifies the scope of the “no objection” sought in this PAR.

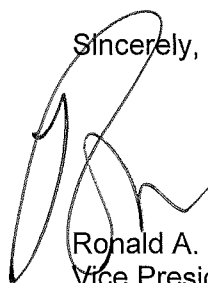
This letter contains no regulatory commitments.

Should you have any questions, please contact Mrs. April R. Rice by telephone at (803) 941-9858, or by email at arice@scana.com.

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

Executed on this 21st day of April, 2015.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

MMD/RAJ/mmd

Enclosure 1: Virgil C. Summer Nuclear Station Units 2 and 3 – Preliminary Amendment Request Regarding Annex and Radwaste Building Changes (PAR 13-09)

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South Carolina Electric and Gas Company

NND-15-0241

Enclosure 1

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

Preliminary Amendment Request

Regarding

Annex and Radwaste Building Changes

(PAR 13-09)

NND-15-0241

Enclosure 1

PAR 13-09: Annex And Radwaste Building Changes

Pursuant to 10 CFR 50.90, South Carolina Electric and Gas Company (SCE&G) requested an amendment to Combined License (COL) Numbers NPF-93 and NPF-94, for Virgil C. Summer Nuclear Station (VCSNS) Unit 2 and 3, respectively. Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule was also requested for the plant-specific DCD Tier 1 material departures. Accordingly, SCE&G requests the determination of whether the NRC has any objection to proceeding with the construction of the VCSNS Unit 2 Annex Building as identified in the Preliminary Amendment Request (PAR) provided below.

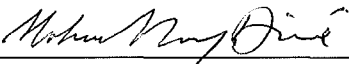

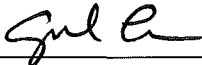
PAR Number PAR 13-09	Station Name VCSNS	Unit Number <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3	PAR Date 04/21/14
1. NRC PAR Notification Requested Date (see Block 7 for basis) <u>June 21, 2015</u>			
2. License Amendment Request References (as applicable) <input checked="" type="checkbox"/> LAR submittal date and SCE&G Correspondence Number: February 27, 2014 / NND-14-0048 as modified on July 09, 2014 / NND-14-0383 and September 25, 2014 / NND-14-0572 <input type="checkbox"/> Expected LAR submittal date: _____			
3. Brief Description of Proposed Change This proposed change would revise the licensing basis, particularly the plant-specific Tier 1 (and COL Appendix C) figures and Updated Final Safety Analysis Report (UFSAR) figures related to the Annex Building column lines. The changes to column line designations in certain section views are editorial, conforming in nature and no physical changes are proposed. The Annex Building column lines on UFSAR Tier 2 Figure 3.7.2-19 (Sheets 2, 3, 5, 6, 7, and 8) sensitive unclassified non-safeguards information (SUNSI) are proposed to be changed from 10 to 10.05 to resolve inconsistencies in the column line designation between the Annex Building and the Auxiliary Building figures in the UFSAR. The column line 10 designation for the Auxiliary Building figures corresponds to North Coordinate 1089'-0" whereas the column line 10 designation for the Annex Building figures corresponds to North Coordinate 1092'-0". This update is proposed to align column line 10 between the Annex and Auxiliary Buildings. The Annex Building column line on UFSAR Tier 2 Figure 3.7.2-19 (Sheet 8) (SUNSI) is proposed to be changed from 12 to 11.15 for consistency with the column line designations in Figure 3.7.2-19 Sheets 1, 2, 3, 5, 6, and 7 (SUNSI). Because the column line changes in Tier 2 are also included in Tier 1, plant-specific DCD Tier 1 (and COL Appendix C) Figures 3.3-11A (SUNSI), 3.3-12 (SUNSI) and 3.3-13 (SUNSI) are proposed to be changed to remove column line designations for columns 6, 8, 10, 11.15, 13.2, 13.3, 14.1, 15.1, 15.2, A, B, C and D. The changes to the Tier 1 Annex Building figures are being made because none of the column lines proposed to be removed are referred to in any Tier 1 tables or text.			

PAR Number PAR 13-09	Station Name VCSNS	Unit Number <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3	PAR Date 04/21/14
<p>4. Reason for License Amendment Request</p> <p>These proposed changes are for consistency between the Annex Building and Auxiliary Building figures in the UFSAR and modifies the description of the facility/design in the plant-specific DCD Tier 1. Plant specific DCD Tier 1 Section 1.1 identifies that the design function of a column line is to provide a designation on the plant reference grid which is used to define the location of building walls and columns. The lines are used for clarifying the location of specific walls or sections. These proposed changes are being made to the Annex Building figures identified in item 3 to be consistent with the Auxiliary Building figures.</p>			
<p>5. Is an Exemption Request Required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, Briefly Describe Reason for Exemption</p> <p>An exemption is requested because LAR 13-09 requests a departure from plant-specific DCD Tier 1 information, as provided in 10 CFR Part 52, Appendix D, Design Certification Rule for the AP1000 Design. Specifically, a plant-specific departure from the DCD Tier 1 Figures would change the column line designations currently shown on the figures.</p>			
<p>6. (Optional) Identify Applicable Precedents</p> <p>Reference 5: Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4 Preliminary Amendment Request PAR-13-019: Annex Building Column Line Changes May 6, 2014 (ND-14-0690)(ML14126A787)</p>			
<p>7. (As needed) Impact of Change on Installation and Testing Schedules</p> <p>SCE&G requested date for approval of this preliminary amendment request is June 21, 2015. This date will allow Unit 2 Annex Building construction to proceed using updated figures. As such, this PAR requests a “no objections” finding related to the license amendment (LAR 13-09).</p> <p>SCE&G requests to proceed with Unit 2 Annex Building construction using the updated figure information defined in the proposed changes to the licensing basis as described below. Figures that contain SUNSI, also known as Security-Related Information (SRI), are identified as such and requested to be withheld under 10 CFR 2.390(d).</p> <ul style="list-style-type: none"> • UFSAR Figure 3.7.2-19 (Sheets 2, 3, 5, 6, 7, and 8) (SUNSI) – Column Line 10 designation is changed to 10.05. • UFSAR Figure 3.7.2-19 (Sheet 8) (SUNSI) – Column Line 12 designation is changed to 11.15. • Plant-specific DCD Figures 3.3-11A (SUNSI), 3.3-12 (SUNSI), and 3.3-13 (SUNSI) – Column Line designations for Column Lines 6, 8, 10, 11.15, 13.2, 13.3, 14.1, 15.1, 15.2, A, B, C and D are deleted. There are also corresponding changes to COL Appendix C Figures 3.3-11A (SUNSI), 3.3-12 (SUNSI), and 3.3-13 (SUNSI). <p>The changes to column line designations in certain section views are editorial, conforming in nature and no physical changes are proposed.</p>			

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Enclosure 1

PAR 13-09: Annex And Radwaste Building Changes

PAR Number PAR 13-09	Station Name VCSNS	Unit Number <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3	PAR Date 04/21/14
8. Impact of Change on ITAAC <p>Tier 1 and COL Appendix C, Section 3.3 provides the physical arrangement of the Annex Building as shown on Figures 3.3-1 through 3.3-14. The proposed activity would change the Annex Building column line designations as shown in Figures 3.3-11A, 3.3-12, and 3.3-13. This PAR should be considered for any inspections related to ITAAC 3.3.00.01 (Item Nos.759) of SCE&G Unit 2 and 3 COL Appendix C Table 3.3-6. The final approval of LAR 13-09 will allow closure of this ITAAC. A "no objections" finding is requested for this PAR to allow construction to proceed pursuant to the process outlined in COL Condition 2.D. (1), Changes during Construction.</p>			
9. Additional Information None			
10. Preparer Name (Print) MOHAMED MORS DIANE	11. Preparer Signature 	12. Date 4-17-15	
13. Reviewer Name (Print) Justin Bouknight	14. Reviewer Signature 	15. Date 4/17/15	
16. Approver Name (Print) April Rice	17. Approver Signature 	18. Date 4-20-15	