



Ronald A. Jones
Vice President
New Nuclear Operations

August 27, 2015
NND-15-0512
10 CFR 52.98
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 & 3
Combined License Nos. NPF-93 and NPF-94
Docket Nos. 52-027 & 52-028

Subject: VCSNS Units 2 & 3 LAR 13-22S2: Request for License Amendment and Exemption: Annex Building Structure and Layout Changes Supplement 2

References: 1. NND-14-0525 VCSNS Units 2 & 3 LAR 13-22: Request for License Amendment and Exemption: Annex Building Structure and Layout Changes, Dated December 4, 2014 (Accession Number ML14339A637)

2. ND-14-1414 Southern Nuclear Operating Company Vogtle Electric Generating Plant Units 3 and 4 Revised Request for License Amendment and Exemption: Annex Building Structure and Layout Changes (LAR-13-038R) Dated September 23, 2014 (Accession Number ML14266A656)

3. Request for Additional Information Letter No. 01 Related to License Amendment Request (LAR) 13-038 and Exemption, Annex Building Structure and Layout Changes, for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses (RP9486) Dated October 28, 2014 (Accession Number ML14301A327)

4. ND-14-1732 Southern Nuclear Operating Company Vogtle Electric Generating Plant Units 3 and 4 Response to Request for Additional Information Related to Request for License Amendment and Exemption: Annex Building Structure and Layout Changes (LAR-13-038RS2) Dated November 6, 2014 (Accession Number ML14310A831)

In accordance with the provisions of 10 CFR 52.98 and 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G), the Licensee for Virgil C. Summer Nuclear Station Units 2 & 3, requested an amendment to Combined License (COL) Numbers NPF-93 and NPF-94, for VCSNS Units 2 & 3, respectively, in Reference 1.

The requested amendment, LAR 13-22, proposed changes to the structure and layout of various areas of the annex building and required changes to the Updated Final Safety Analysis Report (UFSAR) in the form of departures from Tier 2 information, and also involved changes to related plant-specific Tier 2* and Tier 1 information. Reference 1 is identical in technical content to Reference 2, with the exception of a site-specific physical security evaluation.

In Reference 3, the Nuclear Regulatory Commission (NRC) issued to Southern Nuclear Operating Company (SNC) a Request for Additional Information (eRAI 7712). Reference 4 contains the SNC RAI response to the RAI questions and an additional clarifying question received from the NRC via electronic mail

Since Reference 1 and Reference 2 are nearly identical, SCE&G is providing a response similar in content to Reference 4. The SCE&G response is included as Enclosure 1 of this letter.

The information provided in this supplement does not impact the scope, Technical Evaluation, or Significant Hazards Consideration Determination in Reference 1.

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 its enclosures to the designated state official.

Should you have any questions about this letter, please contact April Rice, Manager, Nuclear Licensing, by telephone at (803) 941-9858, or by email at april.rice@scana.com.

This letter contains no regulatory commitments.

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

Executed on this 27th day of August, 2015.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

DK/RAJ/dk

Enclosure 1: Virgil C. Summer Nuclear Station Units 2 & 3 – SCE&G Responses to NRC Request for Additional Information No. 01 (eRAI 7712).

cc : Denise McGovern
Ruth Reyes
Chandu Patel
Paul Kallan
Tom Fredette
Tomy Nazario
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
Amanda Pugh
Neil Haggerty
Joel Hjelseth
Pat Young
Michael Frankle
AJ Marciano
Sean Burk
Zach Harper
Brian McIntyre
Brian Bedford
Carl Churchman
Joseph Cole
Chuck Baucom
Lisa Alberghini
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-15-0512

Enclosure 1

SCE&G Response to NRC

Request for Additional Information

Letter No. 01 (eRAI 7712)

(LAR 13-22S2)

(This enclosure contains 5 pages, including this cover sheet)

eRAI Tracking No. 7712

The responses provided in this enclosure are applicable to Virgil C. Summer Nuclear Station, Units 2 and 3 License Amendment Request (LAR) 13-22.

Question 13.06-1:

In the Vogtle Electric Generating Plant (VEGP), License Amendment Request (LAR) regarding Annex Building Structure and Layout Changes (LAR-13-038R), the licensee stated that “A review of the proposed changes addressed in this LAR was conducted by Westinghouse and Licensee personnel familiar with current security regulations and industry practices in the security field and who possess design-specific knowledge of the AP1000 security systems.” However, this LAR does not provide any status on the physical barrier as describe in APP-GW-GLR-066, “AP1000 Safeguards Assessment Report,” (Technical Report [TR]-94), Attachment 2. (Note: TR-94 is a Safeguards Information (SGI) document, and is not available to the public.)

The staff request additional clarification on how the proposed changes addressed in this LAR will impact the physical barrier in access corridor 40301, as describe in Attachment 2 of TR-94, page 81, Paragraphs 1 & 4.

The licensee’s response should include the future status of the physical barrier as it relates to the proposed changes described in LAR-13-038R. Describe any changes to physical barrier. Also, provide a brief description from the licensee’s analysis of how the licensee concluded that these changes do not affect the outcomes of the TR-94 scenarios, or future staffing.

Regulatory Reference:

10 CFR 73.55(b)(4), “the licensee shall analyze and identify site-specific conditions including target sets, that may affect the specific measures needed to implement the requirements of 10 CFR 73.55 and shall account for these conditions in the design of the physical protection program.” Each applicant or licensee is responsible for analyzing and identifying site-specific conditions that affect how NRC requirements are implemented and to account for these site-specific conditions in the design and implementation of the onsite physical protection program.

Licensee’s Response to Question 13.06-1:

The security delay barriers on either end of the narrow bypass corridor north of room 40305 are being removed from the plant design as a result of the deletion of this narrow corridor from the plant design due to the addition of room 40315 (see markup of UFSAR Figure 1.2-201 in SCE&G Letter NND-14-0525, Enclosure 4, page 3 of 24). Because the corridor is deleted and replaced with a functionally equivalent security barrier (i.e., a wall), the need for these delay barriers no longer exists.

Other security delay barriers in access corridors remain in the plant design following implementation of the requested license amendment. There are no changes to Tier 1 or Tier 2* information related to other security delay barriers located in the two principal access corridors (40301 and 40352), nor are there any changes to these other security delay barriers that involve changes to Tier 1 or Tier 2* information. Accordingly, there are no changes to the other security delay barriers that are related to the proposed changes to the annex building structures and layout included in the scope of SCE&G LAR 13-22.

NND-15-0512

Enclosure 1

LAR 13-22S2: SCE&G Response to NRC eRAI 7712 and Clarifying Question

However, the Licensee notes that various security features, including security delay barriers, in the portions of the annex building affected by LAR 13-22 are undergoing revision by departures that do not involve changes to Tier 1 or Tier 2* information. These changes were determined, in accordance with 10 CFR Part 52, Appendix D, Section VIII.B and the Licensee's departure review process to not require prior NRC approval. Furthermore, the changes to these security delay barriers are not linked to the changes to the annex building layout requested in the LAR. The basis for this determination is that there are no aspects of the security delay barrier purpose or function that rely on the revised annex building structure or layout change contained in this LAR. Conversely, there are no aspects of the revised annex building structure and layout that rely on the revised security barrier design. These two design change activities are independent of each other in purpose and function.

Following implementation of these non-LAR departures, they will be reported to the NRC pursuant to the reporting requirements of 10 CFR 50.59(d)(2) and 10 CFR Part 52, Appendix D, Sections X.B.1 and X.B.3.b. The Licensee's evaluations of these departures, including their impact on the outcome of the TR-94 scenarios, are available for NRC audit, upon request.

Clarification Question on LAR 13-038

Enclosure 6 Page 10 of 25 states an editorial change to Tier 1 Table 3.3-1 as follows:

- The proposed Tier 1 Table 3.3-1 changes to refer to the "Containment Filtration Rm A (North Wall)" and "Containment Filtration Rm A (East Wall)" as "Containment Filtration Rooms A and B (North Wall)" and "Containment Filtration Rooms A and B (East Wall)" are editorial (i.e., non-technical) changes for clarity and consistency. No design change is involved.

Further, Enclosure 6 Page 6 of 25 states that the north and east walls serve both containment rooms A and B by extending from the Room A floor elevation (El 135'-3") to the Room B ceiling elevation (EL 158'-0"). In evaluating this proposed change the staff reviewed UFSAR Tier 2 Figure 3.7.2-19 (Sheet 7 of 10) which shows the Containment Filtration Rooms A and B (North Wall). In reviewing this figure, the staff noticed that while Table 3.3-1 identifies the elevation range for this wall as from 135'-3" to 158'-0," UFSAR Tier 2 Figure 3.7.2-19 (Sheet 7 of 10) does not show this wall as extending to elevation 158'-0" and does not show the ceiling for Containment Filtration Room B. As such, the staff requests the applicant to clarify whether the Containment Filtration Room B ceiling is at elevation 158'-0" and the North Wall of Containment Filtration Rooms A and B extends to elevation 158'-0."

Licensee's Response to NRC Clarification Question on LAR-13-038 for LAR 13-22:

The Licensee is aware that the Containment Filtration Rooms A and B (North Wall) is depicted on UFSAR Tier 2 Figure 3.7.2-19 (Sheet 7 of 10) as rising to an elevation of slightly less than the 158'-0" elevation specified in Tier 1 Table 3.3-1. However, as indicated in Note 7 of Tier 1 Table 3.3-1, the floor elevations are only provided as reference points to define the general location of a described wall or section. For the Containment Filtration Rooms A and B, the closest defined elevation to use as the reference point for the top of the North Wall is El. 158'-0", which is the floor elevation at the nearby column line 4.

Notwithstanding the above, the Licensee has processed a Revision Notice (RN-14-133) to incorporate a departure to Figure 3.7.2-19 (Sheet 7 of 10) that more accurately depicts the top of concrete elevation of this wall at a height that is approximately equivalent to the 158'-0" elevation of the adjacent floor between column lines 2 and 4. This Tier 2 departure was determined to not involve a change to Tier 1 or Tier 2* information; therefore, a 10 CFR 50.59 / 10 CFR 52 Appendix D, Section VIII review performed in accordance with the licensee's departure review process determined that no prior NRC approval was required.

Regarding the omission of a ceiling from the Figure 3.7.2-19 (Sheet 7 of 10) depiction of the Containment Filtration Room B, it has been confirmed that this room does not have a ceiling, but rather is open to the annex building space above this enclosure.

Accordingly, the bulleted text on page 6 of 24 of Enclosure 1 of SCE&G Letter NND-14-0525 is revised from:

- In Table 3.3-1 the entries for "Containment Filtration Rm A (North Wall)" and "Containment Filtration Rm A (East Wall)" each indicate an elevation from El. 135'-3"

to 158'-0". However, Room A is directly below Room B, so the north and east walls actually serve both rooms by extending from the Room A floor elevation (El. 135'-3") to the Room B ceiling elevation (El. 158'-0"). Therefore, a change is proposed to the "Wall or Section Description" for both walls to refer to them as "Containment Filtration Rms A and B" walls.

To read:

- In Table 3.3-1 the entries for "Containment Filtration Rm A (North Wall)" and "Containment Filtration Rm A (East Wall)" each indicate an elevation from El. 135'-3" to 158'-0". However, Room A is directly below Room B, so the north and east walls actually serve both rooms by extending from the base of the wall at the Room A floor at elevation 135'-3" to the top of the wall alongside Room B at elevation 158'-0". Therefore, a change is proposed to the "Wall or Section Description" for both walls to refer to them as "Containment Filtration Rms A and B" walls.