



**April R. Rice**  
Manager, Nuclear Licensing  
New Nuclear Deployment

October 12, 2015  
NND-15-0591

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:** Supplement to South Carolina Electric & Gas Company (SCE&G) 60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident

**Reference:** 1. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident; Dated April 13, 2012 (Accession Number ML12095A342)

2. NND-12-0298 South Carolina Electric & Gas Company (SCE&G) 60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident; Dated June 7, 2012 (Accession Number ML12164A172)

On April 13, 2012, the NRC staff issued Reference 1 to SCE&G. This letter requested Information associated with Near Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness (EP) programs with respect to staffing levels and communications systems. SCE&G responded to Reference 1 with Reference 2. In Reference 2 several dates were provided for the Licensee's performance of staffing and communications assessments, and the delivery of reports resulting from those assessments. The assessment reports will fulfill the NRC request for information in Reference 1.

Due to recent construction schedule modifications for VCSNS Units 2 & 3, the dates initially provided by SCE&G in Reference 2 for performance of the EP staffing and communications equipment assessments, and submittal of the associated assessment reports, have changed. Enclosure 1 of this letter contains a table from Reference 2 with the dates revised to align with the current schedule for performance of these activities.

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 12<sup>th</sup> day of October, 2015.

Sincerely,



April R. Rice  
Manager, Nuclear Licensing  
New Nuclear Deployment

DK/ARR/dk

Enclosure 1: Supplement 1 to SCE&G Response to NRC Request for Information  
Regarding Emergency Planning Staffing Levels and Communications  
Equipment

cc : Billy Gleaves  
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  
Bob Williamson  
Matt Kunkle  
Mory Diane  
Bryan Barwick  
Dean Kersey  
Margaret Felkel  
Cynthia Lanier

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Kristin Seibert  
Amanda Pugh  
Neil Haggerty  
Joel Hjelseth  
Pat Young  
Michael Frankle  
Sean Burk  
Brian McIntyre  
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-15-0591**

**Enclosure 1**

**Supplement 1 to SCE&G Response**

**to NRC Request for Information**

**Regarding Emergency Planning Staffing**

**Levels and Communications Equipment**

Proposed Alternative Course of Action for  
Responding to Recommendation 9.3 Information Request

**Communications**

Request #	Estimated Completion Date	Requested Information
1	7/28/2017	<p>Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described in NEI 12-01. The assessment should:</p> <ul style="list-style-type: none"> <li>• Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies,</li> <li>• Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies,</li> <li>• Provide a description of any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, and</li> <li>• Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all AC power</li> </ul>
2	7/28/2017	Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.
3		Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.
	6/30/2017	Conduct the communications assessment.
	7/28/2017	Provide an implementation schedule of the time needed to implement the results of the communications assessment.

**Staffing**

Request #	Estimated Completion Date	Requested Information
1		<p>Provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described in NEI 12-01. This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:</p> <ul style="list-style-type: none"><li>• How onsite staff will move back-up equipment (e.g., pumps, generators) from alternate onsite storage facilities to repair locations at each reactor as described in the order regarding the NTTF Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table B-1 such as plant operations and assessments of operational aspects, emergency direction and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate.</li><li>• New staff of functions identified as a result of the assessment.</li><li>• Collateral duties (personnel not being prevented from timely performance of their assigned functions).</li></ul>
	9/29/2017	Provide onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment]
	9/29/2017	Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment]

2		Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes.
		1. Conduct the onsite and augmented staffing assessment:
	8/30/2017	The onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment]
	8/30/2017	The onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2 [Phase 2 staffing assessment]
		2. A schedule of the time needed to implement changes will be provided as follows:
	9/29/2017	Those associated with the Phase 1 staffing assessment.
	9/29/2017	Those associated with the Phase 2 staffing assessment.
3	9/29/2017	Identify how the augmented staff would be notified given degraded communications capabilities.
4	9/29/2017	Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.
5	9/29/2017	Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.
6		Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.).
		Changes will be identified as follows:
	9/29/2017	Those associated with the Phase 1 staffing assessment.
	9/29/2017	Those associated with the Phase 2 staffing assessment.