



February 26, 2016
RC-16-0028

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Dear Sir/Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
SOUTH CAROLINA ELECTRIC & GAS (SCE&G)
NOTIFICATION OF AN INTENDED CHANGE TO A COMMITMENT
DATE FOR RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION REGARDING PHASE 2 STAFFING SUBMITTALS
ASSOCIATED WITH NEAR-TERM TASK FORCE RECOMMENDATION
9.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER
PLANT ACCIDENT

- References:
1. SCE&G Letter, "Response to Request for Additional Information Regarding Phase 2 Staffing Submittals Associated with Near-Term Task Force Recommendation 9.3 Related to the Fukushima Dai-ichi Nuclear Power Plant Accident," dated June 16, 2015 [ML15169A090]
 2. NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near Term Task Force (NTTF) Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 [ML12053A340]
 3. NRC Letter, "Virgil C. Summer Nuclear Station, Unit 1 – Relaxation of the Schedule Requirements of Order EA-12-049, "Issuance of order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC No. MF2338)," dated October 4, 2015 [ML15243A450]

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority is providing a notification of an intended change to a commitment date. Specifically, SCE&G committed to review the staffing analysis report (Reference 1), required by Reference 2, with final validated FLEX Support Procedures (FSPs) and other applicable procedures. Due to the relaxation of the schedule requirements granted by Reference 3, SCE&G is providing a commitment date change for completing the review of the Phase 2 Staffing Analysis Report to August 15, 2016.

Enclosure 1 provides the bases for the commitment date change. Enclosure 2 contains the revised Regulatory Commitment Date for the review and resubmittal, if required, of the Phase 2 Staffing Analysis Report.

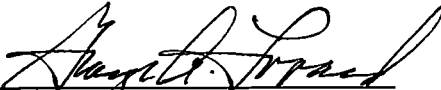
ADID
NRK

Should you have questions concerning the content of this letter, please contact Bruce Thompson at (803) 931-5042.

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

2/26/16

Executed on


George A. Lippard

TS/GAL/rp

Enclosure 1: Bases for the Commitment Date Change

Enclosure 2: List of Regulatory Commitments

c: K. B. Marsh
S. A. Byrne
J. B. Archie
N. S. Carns
J. H. Hamilton
J. W. Williams
W. M. Cherry
M. O. Valentin
C. Haney
S. A. Williams
NRC Resident Inspector
K. M. Sutton
NSRC
RTS (CR-12-01102)
File (815.07)
PRSF (RC-16-0028)

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**VIRGIL C. SUMMER NUCLEAR STATION UNIT 1
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ENCLOSURE 1

BASES FOR THE COMMITMENT DATE CHANGE

1. Notification

SCE&G intends to adjust the commitment date for the review of Phase 2 staffing analysis report with final validated FLEX Support Procedures (FSPs) and other applicable procedures as reported in Reference 1. The scheduled completion date is changed from February 15, 2016 to August 15, 2016. The change to the commitment date does not affect the station's compliance to Reference 2, as the Nuclear Regulatory Commission (NRC) has approved VCSNS's June 16, 2015 submittal of its Phase 2 staffing analysis report (Reference 3). This commitment date change will not affect the station's alternative implementation date of July 31, 2016, regarding NRC Order EA-12-049 as approved in Reference 4.

VCSNS is in the process of implementing the Alternate Emergency Feedwater (EFW) suction strategy as described in Reference 5. In addition to implementing the Alternate EFW suction modification, the station will also have to update FLEX procedures and complete operations training for the Alternate EFW suction strategy to fully comply with NRC Order EA-12-049. VCSNS is scheduled to be in full compliance with NRC Order EA-12-049 by July 31, 2016. Since the review of the Phase 2 staffing analysis report cannot take place until FSPs and other applicable procedures are finalized and validated, the commitment date change to August 15, 2016, is required.

2. Background

On March 12, 2012, the NRC issued a request for information (Reference 2). Enclosure 5 of Reference 2 contains specific requested actions and requested information associated with Recommendation 9.3 for Emergency Preparedness (EP) – Staffing. On June 16, 2015, VCSNS submitted its response to the NRC's request for additional information regarding Phase 2 staffing submittals associated with Near-Term Task Force Recommendation 9.3. The Phase 2 staffing analysis report (Reference 1) was completed using draft Emergency Operating Procedure (EOP) and FSP documents. The submittal contained a commitment to review the report based on the final validated FSPs and any applicable new procedures that were not available when the shift staffing study table tops were conducted. In addition, if required, the Phase 2 staffing analysis was to be revised and resubmitted by February 15, 2016.

3. Justification for Commitment Date Change

VCSNS has submitted a staffing analysis to meet the requirements of Reference 2. The NRC approved the June 16, 2015 Phase 2 staffing analysis submittal on February 7, 2016 (Reference 3). The approval states, "The NRC staff reviewed your Phase 2 staffing submittal and confirmed that your existing emergency response resources, as described in your emergency plan, are sufficient to perform the required plant actions and emergency plan functions, and implement the event response strategies that were developed in response to NRC Order EA-12-049 without the assignment of collateral duties that would impact the performance of assigned emergency plan functions." The NRC staff concluded that VCSNS's Phase 2 staffing submittal adequately addressed the response strategies needed to respond to a BDBEE using the station's procedures and guidelines.

The original commitment date listed in Reference 1 was based on VCSNS fully complying with EA-12-049 at the end of its fall outage (Refueling Outage 22) starting the beginning of October 2015. However, a request for schedule relaxation was made and granted (References 4 and 5), allowing VCSNS to fully comply with EA-12-049 by implementing a new EFW suction strategy by July 31, 2016. The request was required because it was determined the station's Condensate Storage Tank did not meet the high wind protection from tornado hazard requirements in NEI 12-06 and was not creditable for NEI 12-06. Final validated FSPs and possible new procedures have not been finalized because of the need to implement the new EFW suction strategy.

Implementation of the Alternate EFW suction strategy is currently underway to meet the full compliance date of July 31, 2016. In addition to implementing the new strategy, VCSNS is also in the process of updating FLEX procedures and training associated with this new FLEX strategy. At this time, VCSNS does not foresee any issues that would cause the approved Phase 2 staffing analysis report to change due to the implementation of the new suction strategy. In order to verify this, VCSNS needs to review the approved Phase 2 staffing analysis with the final validated FSPs and any new applicable procedures once they are completed. Therefore, VCSNS is changing the commitment date to August 15, 2016.

4. References

1. SCE&G Letter, "Response to Request for Additional Information Regarding Phase 2 Staffing Submittals Associated with Near-Term Task Force Recommendation 9.3 Related to the Fukushima Dai-ichi Nuclear Power Plant Accident," dated June 16, 2015 [ML15169A090]
2. NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near Term Task Force (NTTF) Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 [ML12053A340]
3. NRC Letter, "Virgil C. Summer Nuclear Station, Unit 1 – Response Regarding Phase 2 Staffing Submittals Associated with Near-Term Task Force Recommendation 9.3 Related to the Fukushima Dai-ichi Nuclear Power Plant Accident (CAC No. MF6395)," dated February 7, 2016 [ML15351A347]
4. NRC Letter, "Virgil C. Summer Nuclear Station, Unit 1 – Relaxation of the Schedule Requirements of Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC No. MF2338)," dated October 4, 2015 [ML15243A450]
5. SCE&G Letter, "Request for Schedule Relaxation from NRC Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated August 13, 2015 [ML15231A025]

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ENCLOSURE 2

LIST OF REGULATORY COMMITMENTS

Regulatory Commitments

The following table identifies those actions committed to by South Carolina Electric & Gas Company in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Item	Commitment	Scheduled Date
1	Review staffing analysis report with final validated FSPs and other applicable procedures. Revise and resubmit Phase 2 staffing analysis report, if required.	8/15/2016