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U. S. Nuclear Regulatory Commission  
Washington, DC 20555

June 22, 2016

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS), UNIT NO. 1  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NPF-12  
ANNUAL COMMITMENT CHANGE SUMMARY REPORT

Please find attached the 2015 Commitment Change Summary Report. The commitment changes were performed in accordance with VCSNS's Regulatory Commitment Management Program, which was developed following guidance from NEI 99-04 "Guidelines for Managing NRC Commitment Changes."

Should you have any questions, please call Mr. Bruce Thompson at (803) 931-5042.

WCM/GAL/ts  
Attachment

Very truly yours,

George A. Lippard

c: K. B. Marsh  
S. A. Byrne  
J. B. Archie  
N. S. Carns  
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NSRC  
RTS (LTD 662, RR 8850)  
File (810.46)  
PRSF (RC-16-0107)

ADD  
NRR

The following commitment changes, with a brief justification, were performed during 2015 in accordance with VCSNS's Regulatory Commitment Management Program, which was developed following NEI 99-04, "Guidelines for Managing NRC Commitment Changes." The changes are documented in the station's corrective action program condition reports (CRs):

**CR-12-03394**

**Commitment** – Per SCE&G response to Generic Letter 89-13, dated January 31, 1990, VCSNS committed to establish a testing program such that the HVAC Chillers as heat exchangers would be tested and trended for overall heat transfer coefficients.

**Change** – Perform periodic inspection and maintenance of XHX0001A HVAC Chiller in lieu of testing and trending for overall heat transfer coefficients.

**Justification for Change/Deletion** – In the SCE&G response to Generic Letter 89-13 dated January 31, 1990, VC Summer committed to establish a testing program as required. Recommended Action II of GL 89-13 calls for all licensees to conduct a test program to verify the heat transfer capability of all safety related heat exchangers cooled by Service Water. GL 89-13 also states that an equally effective program to ensure satisfaction of the heat removal requirements would be acceptable. An example of an alternative action that would be acceptable to the NRC is frequent regular maintenance of the heat exchanger in lieu of testing. In the Fall of 2011, HVAC Chiller XHX0001A was replaced. Due to the differences in design of replacement Chiller XHX0001A, specifically Service Water flow modulation through the condensers and alternation of active circuits, heat transfer testing to satisfy the site commitment to GL 89-13 Recommended Action II is no longer feasible. Instead, periodic inspection and maintenance in lieu of testing will be used for replacement chillers to satisfy the commitment to Recommended Action II. Chillers XHX0001B and XHX0001C will continue to be tested for heat transfer capability and are not included in this commitment change.

**CR-09-02503**

**Commitment** - Per SCE&G response to Generic Letter 89-13, dated January 31, 1990, VCSNS committed to establish a testing program as required such that the emergency diesel generator (EDG) Lube Oil Coolers would be tested and trended for overall heat transfer coefficients.

**Change** - Perform periodic inspection and maintenance of the EDG Lube Oil Coolers in lieu of testing and trending for overall heat transfer coefficients.

**Justification for Change/Deletion** – In the SCE&G response to Generic Letter 89-13 dated January 31, 1990, VC Summer committed to establish a testing program as required. The Diesel Generator Lube Oil Coolers were listed as heat exchangers that will be tested and trended for overall heat transfer coefficients. As recommended in Enclosure 2 of GL 89-13, frequent regular maintenance in lieu of testing might apply to lube oil coolers. Enclosure 2 states: "An example of an alternative action that would be acceptable to the NRC is frequent regular maintenance of a heat exchanger in lieu of testing for degraded performance of the heat exchanger. This alternative might apply to small heat exchangers, such as lube oil coolers or

pump bearing coolers." Periodic inspection and maintenance is currently being performed on the EDG Lube Oil Coolers to verify heat transfer capability and determine when corrective maintenance is required.

**CR-15-01384**

**Commitment** – Performance of MMP-195.001, Turbine Driven Emergency Feedwater Pump XPP0008 Maintenance. PM Frequency C06 (Every 6<sup>th</sup> refueling outage, approximately every 10 years). The last PM performance was RF-15, May 24, 2005.

**Change** - Extend next PM Performance to RF-23, Spring 2017.

**Justification for Change/Deletion** - Extensive modification under ECR-50695, Emergency Feedwater (EFW) Flow Control Enhancements, are planned for implementation during Refueling Outage 23 in the Spring of 2017. The scope of this modification will require a large maintenance window for the entire EFW system and require extensive post-modification and surveillance testing to be performed. Alignment of the XPP0008 internal inspection with implementation of ECR-50695 will reduce the overall system unavailability time and reduce the impact to outage scheduling. At the time of the response to NRC Bulletin 880004, Potential Safety-Related Pump Loss, it was concluded that the potential for wear existed based on the testing parameters; however, no adverse conditions in performance, predictive data or inspection had been observed. Since that time, inspections of all three pumps have not produced any observations indicating hydraulic instability.