



April R. Rice
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July 14, 2016
NND-16-0268
10 CFR 50.90
10 CFR 52.63

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
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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: VCSNS Units 2 & 3 LAR 13-31 S2: Supplement 2 to Request for License Amendment and Exemption: Relocation of Air Cooled Chiller Pump 3, VWS-MP-03

- Reference:
1. NND-15-0286, South Carolina Electric & Gas Company (SCE&G) LAR 13-31, Request for License Amendment and Exemption: Relocation of Air Cooled Chiller Pump 3, VWS-MP-03, dated October 21, 2015 (ML15295A090)
 2. NND-16-0096, South Carolina Electric & Gas Company (SCE&G) LAR 13-31 S1, Supplement 1 to Request for License Amendment and Exemption: Relocation of Air Cooled Chiller Pump 3, VWS-MP-03, dated March 31, 2016 (ML16091A380)
 3. LAR 13-31 Talking Points for 6-30-16, Summer_COL_eRAIs Email Number 139, dated June 17, 2016 (ML16169A158)

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) requested an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 combined license numbers NPF-93 and NPF-94, respectively. The requested amendment, provided in Reference 1, proposed to relocate Air Cooled Chiller Pump 3 and its associated equipment. This requires changes to the Updated Final Safety Analysis Report (UFSAR) plant-specific Design Control Document (DCD) Tier 2 and Tier 2* information, and involves changes to related plant-specific Tier 1 information.

The License Amendment Request (LAR) requested changes to the combined license (COL) Appendix C. Pursuant to the provisions of 10 CFR 52.63(b)(1), SCE&G included with the amendment request an exemption request to support the proposed departure from Tier 1 material.

Provided in Reference 2 were Enclosures 1A and 2A, which included various changes to the LAR and Exemption request denoted by a revision bar in the right hand margin.

Enclosure 4 of this letter provides a voluntary response to NRC talking points discussed in the Public Meeting on June 30, 2016 (Reference 3). This supplement intends to clarify the information provided in Reference 2. The supplemental information provided in this letter does not impact the scope of the requested amendment, nor the conclusion of the significant hazards consideration determination.

In order to support the VCSNS Unit 2 construction schedule, SCE&G requests NRC staff review and approval of the license amendment no later than January 13, 2017. Approval by this date will allow sufficient time to implement licensing basis changes prior to affected construction activities. SCE&G expects to implement the proposed amendment within thirty days of approval. Southern Nuclear Operating Company (SNC) has stated that the current requested approval date for Vogtle Electric Generating Plant (VEGP) Unit 3 is October 28, 2016.

In accordance with 10 CFR 50.91, SCE&G is notifying the State of South Carolina of this LAR supplement by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact Mr. Nick Kellenberger by telephone at (803) 941-9834, or by email at nicholas.r.kellenberger@scana.com.

This letter contains no regulatory commitments.

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

Executed on this 14th day of July, 2016.

Sincerely,



April R. Rice
Manager
New Nuclear Licensing

MHK/ARR/mhk

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Enclosure 1: Provided via Reference 1 (Updated by Enclosure 1A)

Enclosure 2: Provided via Reference 1 (Updated by Enclosure 2A)

Enclosure 3: Provided via Reference 1

Enclosure 1A: Provided via Reference 2

Enclosure 2A: Provided via Reference 2

Enclosure 4: SCE&G Response to NRC Talking Points Discussed on June 30, 2016 (LAR 13-31 S2)

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**South Carolina Electric and Gas Company
Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3**

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Enclosure 4

SCE&G Response to NRC Talking Points Discussed on June 30, 2016

(LAR 13-31 S2)

(This Enclosure contains three pages, including this cover sheet.)

NRC provided talking points pertaining to VCS LAR 13-31 S1 (ML16091A380) to South Carolina Electric and Gas Company (SCE&G) per Summer eRAI Email No. 139 (ML16169A158). These talking points were discussed at a public meeting on June 30, 2016. During this discussion, SCE&G satisfactorily addressed the NRC's concerns on talking points 1, 2a, and 4.

During the public meeting SCE&G informed the NRC a voluntary response to talking points 2b and 3 would be provided in a letter along with any required changes to the license amendment request (LAR) or exemption request. These talking points are discussed below. Additional text added to the LAR or exemption request is underlined in [blue](#).

Talking Point 2b:

In addition, the same sentence goes on to say the relocation does not have an adverse impact on any structure, system, or component. Is this referring to any SSC, including nonsafety-related SSCs located in the Annex Building, or a subset of SSCs that are safety-related or otherwise necessary for responding to anticipated transients or postulated accident conditions?

SCE&G's Response to Talking Point 2b:

LAR 13-31 proposes to relocate air cooled chiller pump 3 (VWS-MP-03) and its associated equipment from the Auxiliary Building to Annex Building Room 40500. The above question references a section of the LAR that should be referring to any "safety-related" SSC. As previously verified and discussed during the public meeting, Room 40500 of the Annex Building is seismic Category II in its entirety. Additionally, UFSAR Table 9A-3 shows Room 40500 containing no safety-related equipment. Therefore, a change needs to be made to describe that the relocation of VWS-MP-03 to Room 40500 does not have an adverse impact on any *safety-related* SSC.

The following paragraph replaces the third paragraph on Page 5 of 11 in Enclosure 1A (LAR 13-31 S1):

Relocating VWS-MP-03 from the seismic Category 1 Auxiliary Building to the seismic Category II Annex Building does not have an adverse impact on any [safety-related](#) structure, system, or component (SSC), because the VWS is a non-seismic system and is not designed to remain functional following a seismic event. The proposed change does not adversely affect the response of any [safety-related](#) SSC to anticipated transient or postulated accident conditions, because the portions of the VWS affected by this change do not serve a safety-related function, and are therefore not credited in the response to these conditions. The current Annex and Auxiliary Building flooding analyses address flooding from the chilled water system and the changes proposed by this activity do not alter the conclusions of these analyses.

Therefore, the relocation of VWS-MP-03 and associated piping changes have no adverse impact on these flooding analyses.

Similarly, the following paragraph replaces the fourth paragraph on Page 3 of 7 in Enclosure 2A (LAR 13-31 S1):

Relocating VWS-MP-03 from the seismic Category 1 Auxiliary Building to the seismic Category II Annex Building does not have an adverse impact on any [safety-related](#) structure, system, or component (SSC), because the VWS is a non-seismic system and is not designed to remain functional following a seismic event. The proposed change does not adversely affect the response of any [safety-related](#) SSC to anticipated transient or postulated accident conditions, because the portions of the VWS affected by this change do not serve a safety-related function, and are therefore not credited in the response to these conditions. The current Annex and Auxiliary Building flooding analyses address flooding from the chilled water system and the changes proposed by this activity do not alter the conclusions of these analyses. Therefore, the relocation of VWS-MP-03 and associated piping changes have no adverse impact on these flooding analyses.

Talking Point 3:

Potential editorial error: Page 7 of 11, first paragraph of Section 4.3. The last sentence states "...and involves associated changes to UFSAR Tier 2 information". Should this be Tier 2* information?

SCE&G's Response to Talking Point 3:

This is an editorial error and thus should be "Tier 2*" information.

The following paragraph replaces the first paragraph of Section 4.3 on Page 7 of 11 in Enclosure 1A (LAR 13-31 S1):

The requested change(s) would revise VCSNS Units 2 and 3 Combined Licenses (COLs) by modifying the low capacity Central Chilled Water System (VWS). This change relocates Air Cooled Chiller Pump 3, VWS-MP-03, and associated equipment, from the Auxiliary Building to the Annex Building and adds a new chemical feed tank. This activity requires changes to Updated Final Safety Analysis Report (UFSAR) Tier 2 information, and involves associated changes to UFSAR Tier 2* information and VCSNS Units 2 and 3 COL Appendix C (and plant-specific Tier 1) information.