



September 28, 2016
NND-16-0410
10 CFR 50.90

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
Docket No. 52-027

Subject: Supplement to Preliminary Amendment Request (PAR): Structural
Design of Auxiliary Building Floors (PAR 14-14 S)

By letter NND-16-0214, dated July 7, 2016, South Carolina Electric & Gas Company (SCE&G) submitted a Preliminary Amendment Request (PAR), PAR 14-14 [ML16189A445], to minimize construction delays for Virgil C. Summer Nuclear Station (VCSNS) Unit 2 during the NRC's evaluation of the related License Amendment Request (LAR) 14-14 R1. PAR 14-14 specifically requested a "no objection" to proceeding with construction of the floor structures of the CA20 Piping/Valve Room (Room number 12262) at design elevation 82'-6" and the following rooms inside CA20 located at or near design elevation 92'-6": Pipe Chase (Room number 12269), Cask Loading Pit (Room number 12463), Spent Fuel Storage Pit (Room number 12563), and Waste Monitor Tank Room B (Room number 12365). As required by License Condition 2.D.(1), the NRC Staff received the associated LAR 14-14 R1 referenced by PAR 14-14. The Staff then evaluated the license amendment documentation supporting LAR 14-14 R1 and determined that there was sufficient information to accept LAR 14-14 R1 for detailed technical review. This PAR was subsequently accepted with a "no objection" letter issued by the NRC Staff on July 21, 2016 [ML16197A566].

Subsequently, by letter NND-16-0332, dated August 16, 2016, SCE&G submitted a revised LAR, LAR 14-14 R2 [ML16230A179], to amend the VCSNS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) to revise details related to the structural design of auxiliary building floors. This Revision 2 of LAR 14-14 reinstated the full scope of impacted structures, systems, and components (SSCs) discussed in the initial submittal of the LAR under SCE&G letter NND-16-0204 [ML16168A282]. This scope had been narrowed by Revision 1 of LAR 14-14 in SCE&G letter NND-16-0242 [ML16189A453].

The NND-16-0332 cover letter for LAR 14-14 R2 states in part, "Having completed the remaining necessary, supporting calculations, this revision re-instates [emphasis added] the original scope of the request." In the subsequent paragraph, the letter continues,

“Enclosures 3 and 4 of the revised request in Reference 2 [NND-16-0242] are replaced [emphasis added] in their entirety with Enclosures 5 and 6 of this second revised request.”

Because SCE&G is concerned that this wording may not have accurately reflected the intent of the Licensee, SCE&G is providing a clarification below.

The use of “re-instates” in LAR 14-14 R2 is meant to convey information regarding the scope of the SSCs impacted by that revision of the proposed LAR, i.e., elevations 100'-0" to 135'-3" in CA20 and auxiliary building finned floors at elevations 117'-6" and 135'-3". Such scope was included in LAR 14-14, prior to the reduction of the SSCs scope with LAR 14-14 R1. LAR 14-14 R1 has not been withdrawn by SCE&G and still remains on the VCSNS docket.

Enclosures 5 and 6 of LAR 14-14 R2 envelope the scope of changes to the SSCs found in LAR 14-14 R1. The technical information provided in LAR 14-14 R1 (that is the basis for the PAR “no objection” finding) is also included as part of LAR 14-14 R2. The activities conducted under the PAR finding of “no objection” are fully supported by the technical information in LAR 14-14 R2. SCE&G's intent is that Enclosures 3 and 4 remain fully in effect until such time that LAR 14-14 R2 is accepted for technical review in accordance with 10 CFR 50.90 and 10 CFR 52.79. If LAR 14-14 R2 is accepted for technical review, Enclosures 5 and 6 will subsume Enclosures 3 and 4 for the purposes of the NRC technical review of the LAR.

Since LAR 14-14 R1 remains on the docket, and LAR 14-14 R2 envelopes the scope of changes to the SSCs found in LAR 14-14 R1, the basis for the no objection letter for PAR 14-14 remains in effect and therefore SCE&G continues to rely upon the “no objection” notice granted for the scope of the SSCs described by PAR 14-14. This scope is supported by both LAR 14-14 R1 and LAR 14-14 R2.

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.

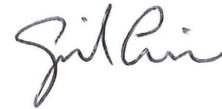
This letter contains no regulatory commitments.

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

Executed on this 28th day of September, 2016.

Sincerely,

A handwritten signature in cursive script, appearing to read "April R. Rice".

April R. Rice
Manager
New Nuclear Licensing

MHK/ARR/mhk

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