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NND-18-0002

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U.S. Nuclear Regulatory Commission  
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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: South Carolina Electric & Gas Company (SCE&G), VCSNS Units 2&3  
Submission of Six (6) Month Status Report Regarding Implementation of  
the Overall Integrated Plan for Mitigation Strategies for Beyond Design  
Basis External Events

Reference: 1. Combined Operating License (COL) Numbers NPF-93 and NPF-94  
2. Virgil C. Summer Nuclear Station Units 2 & 3 Overall Integrated Plan  
with Regard to Mitigation Strategies for Beyond Design Basis External  
Events Pursuant to License Condition 2.D(13) "Mitigation Strategies for  
Beyond Design Basis External Events" of Combined License (COL)  
Numbers NPF-93 and NPF-94, dated August 21, 2013.  
(Accession Number ML13234A519)

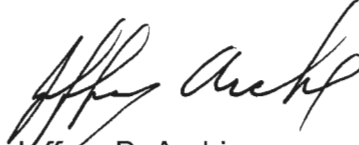
On March 30, 2012, the Nuclear Regulatory Commission (NRC) issued Combined Operating License numbers NPF-93 and NPF-94 (Reference 1) to SCE&G and the South Carolina Public Service Authority (Santee Cooper) for the Virgil C. Summer Nuclear Station Units 2&3, respectively. License condition 2.D(13) of Reference 1 requires the Licensees to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment and spent fuel pool capabilities in the event of a beyond-design-basis event.

In August 2013, SCE&G submitted Reference 2 to the NRC pursuant to license condition 2.D(13)(f)3. This Overall Integrated Plan identified the activities required to fulfill license condition 2.D(13) and identified milestones associated with implementation of the plan in Enclosure 3. Pursuant to license condition 2.D(13)(f)4 of Reference 1, SCE&G hereby submits the enclosed six (6) month status report regarding implementation of the Overall Integrated Plan.

This letter contains no regulatory commitments.

Should you have any questions, please contact Mr. Justin R. Bouknight by phone at (803)941-9828, or by email at [justin.bouknight@scana.com](mailto:justin.bouknight@scana.com).

Sincerely,



Jeffrey B. Archie  
Senior Vice President, SCANA  
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JRB/JBA/

Enclosure: Six (6) Month Status Report Regarding Implementation of the Overall Integrated Plan for Mitigation Strategies for Beyond Design Basis External Events

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**South Carolina Electric & Gas Company**

**Virgil C. Summer Nuclear Station Units 2&3**

**NND-18-0002**

**Enclosure**

**Six (6) Month Status Report Regarding Implementation of  
the Overall Integrated Plan for Mitigation Strategies  
for Beyond Design Basis External Events**

## **1 Introduction**

Virgil C. Summer Nuclear Station Units 2&3 developed an Overall Integrated Plan, Reference 2, documenting the diverse and flexible strategies (FLEX) developed to maintain or restore core cooling, containment and spent fuel pool cooling capabilities following a beyond design basis external event in response to license condition 2.D(13) of Reference 1. The status report in this enclosure provides a six (6) month periodic update of milestone accomplishments since submittal of the Overall Integrated Plan pursuant to license condition 2.D(13)(f)4 of Reference 1.

## **2 Milestone Accomplishments**

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since SCE&G submittal of the Overall Integrated Plan, Reference 2, and are current as of February 15, 2018:

- None

## **3 Milestone Schedule Status**

The following table provides an update to information contained in Enclosure 3 of the Overall Integrated Plan, Reference 2. It provides the activity status of each item, and whether the expected completion date has changed from that submitted in previous status reports.

Dates for future implementation of items included in the Overall Integrate Plan remain in a to be determined (TBD) status, based on the 2017 announcement that SCE&G is abandoning its stake in the construction of Virgil C. Summer Nuclear Station Units 2&3.

## Six Month Status Report Regarding Implementation of the Overall Integrated Plan

Activity	Activity Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct. 2012	Complete	N/A
Submit Overall Integrated Plan	Aug. 2013	Complete	N/A
Submit 6 Month Status Report	Feb. 2014	Complete	N/A
Submit 6 Month Status Report	Aug. 2014	Complete	N/A
Submit 6 Month Status Report	Feb. 2015	Complete	N/A
Submit 6 Month Status Report	Aug. 2015	Complete	N/A
Submit 6 Month Status Report	Feb. 2016	Complete	N/A
Submit 6 Month Status Report	Aug. 2016	Complete	N/A
Submit 6 Month Status Report	Feb. 2017	Complete	N/A
Submit 6 Month Status Report	Aug. 2017	Complete	N/A
Ensure Operational Procedures include necessary information	TBD	Not Started	TBD
Staffing Analysis Completed	TBD	Not Started	TBD
Submit 6 Month Status Report		Not Started	
Training completed for the Phase 3 FLEX strategies	TBD	Not Started	TBD
Initiate Phase 3 Equipment Procurement	TBD	Not Started	TBD
Develop Response Plan with NSRC (Includes Units 1, 2 & 3)	TBD	Not Started	TBD
NSRC Operational for V.C. Summer 2&3	TBD	Not Started	TBD
Demonstration for Unit 2	TBD	Not Started	TBD
Submit 6 Month Status Report		Not Started	
Submit Completion Report for Unit 2	TBD	Not Started	TBD
Submit 6 Month Status Report		Not Started	
Demonstration for Unit 3	TBD	Not Started	TBD
Submit Completion Report for Unit 3	TBD	Not Started	TBD

Unit 2 - Full compliance prior to fuel load

Unit 3 - Full compliance prior to fuel load

#### 4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 2).

#### 5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Virgil C. Summer Nuclear Station Units 2&3 remains compliant with the requirements of license condition 2.D(13)(f) of Reference 1. No relief/relaxation is required at this time.

#### 6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

- None.

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Enclosure

Six Month Status Report Regarding Implementation of the Overall Integrated Plan

## **7 Potential Draft Safety Evaluation Impacts**

- None.

## **8 References**

The following references support the updates to the Overall Integrated Plan described in this enclosure:

1. Combined Operating License (COL) numbers NPF-93 and NPF-94
2. Virgil C. Summer Nuclear Station Units 2 & 3 Overall Integrated Plan with Regard to Mitigation Strategies for Beyond Design Basis External Events pursuant to license condition 2.D(13) "Mitigation Strategies for Beyond Design Basis External Events" of Combined License (COL) Numbers NPF-93 and NPF-94, dated August 21, 2013. (Accession Number ML13234A519)