



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 2, 2019

LICENSEE: South Carolina Electric & Gas, Inc. (SCE&G)
FACILITY: Virgil C. Summer, Unit 1
SUBJECT: VIRGIL C. SUMMER, UNIT 1 – JULY 23, 2019, MEETING SUMMARY
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 805
SUPPLEMENT LICENSE AMENDMENT REQUEST (EPID L-2018-LLA-0233)

On July 23, 2019, a Category 1 public teleconference call was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of South Carolina Electric & Gas Company (SCE&G, licensee) and its contractor, Jensen Hughes, to discuss technical issues related to the licensee's proposed response to U.S. Nuclear Regulatory Commission (NRC) June 27, 2019, Request for Additional Information (RAI) for PRA RAI 03 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19179A126).

The public meeting notice and agenda, dated July 9, 2019 (ADAMS Accession No. ML19196A066), are available in the NRC Public Meeting website. A list of participants is provided in Enclosure 1.

Public Conference Call

During the meeting, SCE&G stated they plan to respond to the June 27, 2019, RAI, utilizing option (ii):

(ii) Alternatively to part (i), provide updated risk results in Table PRA RAI 03-1 of letter dated May 22, 2019 that uses the system time window for operator action to trip RCPs based on the FPRA RCP seal failure model accepted in the safety evaluation associated with Amendment No. 199, and discuss how the updated risk results align with the risk acceptance guidelines of Regulatory Guide 1.205. Propose a mechanism that ensures an NRC-accepted RCP seal failure model is used in the FPRA for self-approval of post-transition changes.

The licensee stated that they plan to revise the Human Error Probability (HEP) for Reactor Coolant Pump (RCP) trip from 60 minutes to 20 minutes as approved in Amendment No. 199.

The licensee stated that they are pursuing the below areas of PRA refinement to meet the risk acceptance guidelines of Regulatory Guide 1.205:

1. Amount of water available for seal injection (i.e., RWST draindown).
2. More extensive circuit analysis and refined cable locations related to loss of seal cooling, RCP trip, etc.
3. Existing fire and other procedures and HRA treatment for refinements.

4. More refined main control board (MCB) fire scenarios for specific failure modes and locations. The licensee stated they are considering utilizing the draft NUREG-2178, "Refining and Characterizing Heat Release Rates from Electrical Enclosures During Fire," Volume 2, "Fire modeling guidance for electrical cabinets, electric motors, indoor dry transformers, and the main control board."

The NRC staff provided the below feedback that was discussed at the meeting, and sent to the licensee on July 30, 2019, as a supplement to the June 27, 2019, PRA RAI 03 (ADAMS Accession No. ML19211D510).

Supplement to Option (ii) [based on July 23, 2019, teleconference discussion]:

Describe in sufficient detail any additional changes to the VCSNS PRA models (i.e., internal events, internal flooding, seismic, and fire) in support of the updated risk results that were not described in the LAR dated August 29, 2018, as supplemented by letters dated April 29, 2019 and May 22, 2019.

Explain and justify whether the changes are PRA maintenance or PRA upgrades as defined in ASME/ANS RA-Sa-2009, Section 1-5.4, as qualified by Regulatory Guide 1.200, Revision 2.

For all PRA changes that constitute a PRA upgrade, state if a peer review has been performed for any PRA upgrades in accordance with an NRC-accepted process. As applicable, provide the open facts and observations (F&Os) characterized as findings associated with this peer review and explain how the F&Os were dispositioned to Capability Category II for this application.

If a peer review was not performed for PRA upgrades, propose a license condition such that prior to implementing self-approval of post-NFPA-805 transition changes:

- PRA upgrades will be appropriately peer reviewed and any finding-level F&Os are closed in accordance with an NRC-accepted process (e.g., focused-scope peer review, F&O closure review, direct submittal to the NRC), and,
- Confirm that the updated transition change-in-risk estimates for this application align with the risk acceptance guidelines of Regulatory Guide 1.205.

SCE&G stated they will submit a response to the June 27, 2019, RAI by August 12, 2019, that will include a description of the PRA refinements, a proposed schedule for submitting a complete response to the June 27, 2019, RAI, and justification for the extended period of time beyond the 30 days RAI response time allowed by regulation.

Regarding the licensee's consideration of utilizing draft NUREG-2178, the NRC staff notes LIC-109, Revision 2, "Acceptance Review Procedures" (ADAMS Accession No. ML16144A521), states, "Unapproved guidance may be used as the basis for a proposed change, however, the licensee must supply all information necessary (i.e., plant-specific justification and technical basis) to support the change."

No regulatory decisions or commitments were made during the meeting. There were no members of the public on the call.

/RA/

Shawn Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-395

Enclosure:
List of Attendees

cc: Listserv

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REGARDING NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 805
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DATED AUGUST 2, 2019

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ADAMS Accession No. ML19196A211

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	NRR/DRA/APLB/BC	DORL/LPL2-1/BC	DORL/LPL2-1/PM
<u>NAME</u>	SWilliams	KGoldstein	MReisi Fard	MMarkley	SWilliams
<u>DATE</u>	7/30/19	8/1/19	8/1/19	8/2/19	8/2/19

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LIST OF PARTICIPANTS
JULY 23, 2019, PUBLIC CONFERENCE CALL
WITH
SOUTH CAROLINA ELECTRIC & GAS
REGARDING
NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 805 SUPPLEMENT
LICENSE AMENDMENT REQUEST

Nuclear Regulatory Commission Staff

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Licensee Participants

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Craig Sly (Dominion)

Lauren Lopez (Dominion)

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