

V. C. Summer Nuclear Station  
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Mailing Address:  
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DominionEnergy.com



September 5, 2019

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Serial No.: 19-376  
VCS LIC/HK: Rev 0  
Docket Nos.: 50-395  
72-1038  
License No.: NPF-12

**SOUTH CAROLINA ELECTRIC & GAS COMPANY**  
**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1**  
**TRANSMITTAL OF EMERGENCY PLAN PROCEDURE REVISION**

Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), attached is the change analysis summary for Revision 2 to the VCSNS Emergency Plan Administrative Procedure, VCS-EPP-0108 – Emergency Action Level Technical Basis Document. This revision incorporated changes that did not require prior NRC approval and does not implement actions that reduce the effectiveness of the VCSNS Emergency Plan. The Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and 10 CFR 50 Appendix E.

If you have any further questions, please contact Alison Fulmer at (803) 941-9844.

Sincerely,

A handwritten signature in black ink, appearing to read 'George A. Lippard', written in a cursive style.

George A. Lippard  
Site Vice President  
V.C. Summer Nuclear Station

Commitments contained in this letter: None

Attachments: VCSNS Emergency Plan Administrative Procedure VCS-EPP-0108, Revision 2,  
10 CFR 50.54(q)(5) Summary

In a letter dated July 30, 2019, South Carolina Electric & Gas Company (SCE&G) requested a License Amendment to amend the VC Summer Operating License to reflect the name change from SCE&G to Dominion Energy South Carolina (DESC). The amendment request is currently under review by the NRC.

cc: (Without Attachments unless noted)

G. J. Lindamood

L. Dudes (with Attachment)

S. A. Williams

Director, Division of Spent Fuel Management (with Attachment)

NRC Senior Resident Inspector – VCSNS

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**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1  
DOCKET NOS. 50-395, 72-1038  
OPERATING LICENSE NO. NPF-12**

**ATTACHMENT**

**VCSNS EMERGENCY PLAN ADMINISTRATIVE PROCEDURE VCS-EPP-0108, REVISION 2,  
10 CFR 50.54(q)(5) SUMMARY**

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V. C. Summer Nuclear Station Emergency Plan Administrative Procedure VCS-EPP-0108 – Emergency Action Level Technical Basis Document, Revision 2, incorporated the changes described below on August 9, 2019. A description of why the changes were not reductions in the effectiveness of the emergency plan and the regulatory basis are provided.

1. Changed values throughout the procedure corresponding to fission product barrier thresholds using RM-G7 and RM-G18 per CR-19-01822.
2. Replaced reference TWR11.5-91-27 with reference TWR 11.0-19-010 throughout the procedure to support threshold value changes.

The changes made to the Emergency Action Level Technical Basis Document procedure maintain requirements in accordance with 10 CFR 50.47 and 10 CFR 50 Appendix E and do not change the intent of the Emergency Plan or the intent of the Emergency Action Levels affected. The timeliness and accuracy of classifications remain unchanged.

These changes continue to meet the regulations and planning standard by still maintaining all the requirements of 10 CFR 50.47 and 10 CFR 50 Appendix E. Overall the changes made to the Emergency Action Level Technical Basis Document procedure improve the capability to classify an emergency and do not reduce the effectiveness of the Emergency Plan and continue to satisfy the Planning Standard.