



May 27, 2021

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No. 20-358
NRA/YG: R0
Docket No. 50-395
License No. NPF-12

DOMINION ENERGY SOUTH CAROLINA (DESC)
VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
PROPOSED AMENDMENT TO RELOCATE UNIT STAFF QUALIFICATIONS FROM
TECHNICAL SPECIFICATIONS TO QUALITY ASSURANCE PROGRAM
DESCRIPTION (QAPD)

Pursuant to the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50.90, "Application for Amendment of License, Construction Permit, or Early Site Permit," Dominion Energy South Carolina (DESC) hereby submits a request for an amendment to the Technical Specifications (TS) for Virgil C. Summer Nuclear Station (VCSNS) Unit 1.

The proposed amendment would modify VCSNS Technical Specifications (TS) 6.3 by relocating "Unit Staff Qualifications" to the Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD) consistent with guidance contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls to Quality Assurance."

Attachment 1 provides a description and assessment of the proposed change. Attachment 2 provides the existing TS pages marked up to show the proposed changes. Attachment 3 provides the revised (clean) TS pages. Attachment 4 provides the No Significant Hazards Consideration. Attachment 5 provides a list of references.

DESC requests approval of the proposed license amendment by May 27, 2022, with a 60-day implementation period.

In accordance with 10 CFR 50.91, "Notice for Public Comment; State Consultation," a copy of this application, with attachments, is being provided to the designated South Carolina State Official.

Should you have any questions, please contact Mr. Yan Gao at (804)-273-2768.

Respectfully,



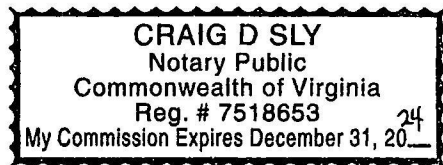
Mark D. Sartain
Vice President – Nuclear Engineering and Fleet Support

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, who is Vice President – Nuclear Engineering and Fleet Support of Dominion Energy South Carolina, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 27th day of May, 2021.

My Commission Expires: 12/31/24


Notary Public

Commitments made in this letter: None.

Attachments:

1. Description and Assessment
2. Existing TS Pages Mark-up
3. Revised (Clean) TS Pages
4. Proposed No Significant Hazards Consideration
5. References

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ATTACHMENT 1

DESCRIPTION AND ASSESSMENT

DESCRIPTION AND ASSESSMENT

1.0 SUMMARY

Dominion Energy South Carolina (DESC) requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Unit 1 Facility Operating License. Specifically, this license amendment request (LAR) proposes to relocate the administrative controls in Technical Specification (TS) 6.3, "Unit Staff Qualifications," to the Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD) [5.1]. This change is consistent with guidance contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance" [5.2].

2.0 DETAILED DESCRIPTION

2.1 Current Requirements and Proposed Change

TS 6.3 currently states:

6.3 Unit Staff Qualifications

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

DESC proposes that TS 6.3 be revised to state:

6.3 Unit Staff Qualifications

6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

Appendix C of the Dominion Energy QAPD, Topical Report DOM-QA-1, "Nuclear Facility Quality Assurance Program Description," Revision 30 lists the Regulatory Guides and Quality Standards Commitments. The VCSNS commitment is described below:

"Regulatory Guide 1.8, Revision 2, April 1987

Qualification and Training of Personnel for Nuclear Power Plants

This commitment applies to the V. C. Summer facility only. This Regulatory Guide endorses ANS-3.1-1981 for the positions of shift supervisor, senior operator, licensed operator and shift technical advisor with certain regulatory positions and the guidance from the Commission's "Policy Statement on Engineering Expertise on Shift." It also endorses the standard's approach for the qualification of the radiation protection

supervisory personnel with the clarification that for the group leader (radiation protection manager (RPM)) 3 of the 4 years of experience in applied radiation protection be professional-level experience.

For the operating organization positions other than those identified in the above paragraph, the Regulatory Guide endorses the requirements of ANS/ANSI N18.1-1971 for the equivalent positions described in the standard.

In lieu of the training requirements stated in ANS-3.1-1981 and ANSI N18.1-1971, VCS commits to using accredited training programs for the categories identified in 10 CFR 50.120."

2.2 Reason for the Proposed Change

DESC desires to eliminate the referenced documents and associated discussions for unit staff qualifications in the TS and use the current unit staff qualifications specified in the QAPD. The proposed change would eliminate an inconsistency between the Unit Staff Qualification requirements described in the Dominion Energy Nuclear Facility QAPD and VCSNS TS 6.3, "Unit Staff Qualifications". Specifically, VCSNS committed to Unit Staff Qualifications requirements in the QAPD, that are based on either the same or more recent versions of ANSI N18.1 and RG 1.8 than those specified in TS 6.3. The existing TS and QAPD requirements for unit staff qualifications are based on different NRC endorsed industry standards to ensure that a licensee's staff is appropriately qualified for their respective positions. Additionally, the proposed change would provide flexibility in adopting updated NRC-endorsed standards for unit staff qualifications without the need to submit LARs.

3.0 ASSESSMENT

3.1 Condition Assessment

10 CFR 50.36(c)(5) requires TS to include administrative controls. These are provisions relating to organization and management, procedures, recordkeeping, review, and audit, and reporting necessary to assure operation of the facility in a safe manner. AL 95-06 [5.2], states that many license amendments were being processed that involved relocating requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation, and relocating requirements that are controlled directly by regulations and related licensee programs. The AL states:

"Increasingly, licensees are requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organizational changes without the need for a

license amendment. Recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included moving requirements to licensee-controlled documents and programs. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the U.S. Nuclear Regulatory Commission staff in preparing and reviewing license amendment requests."

The proposed change is consistent with the guidance in AL 95-06. The unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in the TS as an Administrative Control. The DESC QAPD report is adequately controlled by other regulations and is therefore an acceptable location for the unit staff qualification requirements. Specifically, consistent with the guidance in AL 95-06, future changes to the QAPD staff qualification requirements will be evaluated under the 10 CFR 50.54(a) evaluation process.

3.2 Assessment Summary

VCSNS is requesting approval to eliminate the referenced documents and associated discussions for unit staff qualifications requirements in the TS and follow the applicable qualification requirements currently provided in the QAPD. The proposed change will eliminate an inconsistency between TS 6.3 and the QAPD. Future changes to the QAPD will be controlled via the 10 CFR 50.54(a) evaluation process.

3.3 No Significant Hazards Consideration

DESC has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of the VCSNS in accordance with the proposed amendment presents no significant hazards. The DESC evaluation against each of the criteria in 10 CFR 50.92 is provided as an Attachment (Attachment 4) to this amendment request.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Acceptance Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. The following current applicable regulations and regulatory requirements were reviewed in making this determination:

10 CFR 50.36

10 CFR 50.36, "Technical Specifications," Paragraph (c)(5), "Administrative Controls," requires the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner be included in the TS.

10 CFR 50.120

10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel," requires that each nuclear power plant licensee or applicant for an operator license establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4.

10 CFR Part 55

10 CFR Part 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training.

NUREG-1021, Revision 11

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 11, establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR Part 55, "Operators' Licenses."

Regulatory Guide 1.8

Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC staff finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear power plant personnel. The proposed change would eliminate the unit staff qualification requirements from the TS and maintain the current commitments to RG 1.8 along with any exceptions, alternatives, or calculations as identified in the current QAPD.

4.2 Precedent

On March 1, 2018, Exelon Generation Company (EGC) submitted a LAR [5.3] to relocate the licensee's staff qualification requirements to the EGC Quality Assurance Topical Report. The LAR from EGC was applicable to their fleet consisting of thirteen different facilities. On August 2, 2018, NRC approved the LAR from EGC [5.4].

4.3 Conclusion

DESC has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria. DESC has determined that the applicable regulatory requirements continue to be met. Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

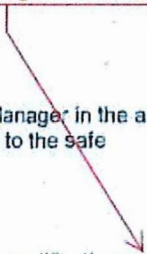
ATTACHMENT 2

EXISTING TS PAGE MARK-UP

ADMINISTRATIVE CONTROLS

6.2.3 NOT USED

referenced for comparable positions as specified in the
Nuclear Facility Quality Assurance Program Description.



6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ~~ANSI N18.1-1971 for comparable positions except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8 September 1976~~

6.4 NOT USED

ATTACHMENT 3

REVISED (CLEAN) TS PAGES

ADMINISTRATIVE CONTROLS

6.2.3. NOT USED

6.2.4. SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3. UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

6.4. NOT USED

ATTACHMENT 4

PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION

PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION

DESC has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of VCSNS in accordance with the proposed amendment presents no significant hazards. The DESC evaluation against each of the criteria in 10 CFR 50.92 is discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change improves consistency in administrative controls and does not make any physical changes to the plant. The proposed change does not alter any accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not impact the accident analyses. The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change does not alter or prevent the ability of the operators to perform their intended actions to mitigate the consequences of an accident or event.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated

3. Does the proposed change involve a significant reduction in the margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not impact operation of the plant or its response to transients or accidents. The proposed change does not involve a change in the method of plant operation, and no accident analyses will

be affected by the proposed change. Safety analysis acceptance criteria are not affected by this proposed change.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, DESC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92, and, accordingly, a finding of "no significant hazards consideration" is justified.

ATTACHMENT 5

REFERENCES

- 5.1 Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD) Topical Report, DOM-QA-1, "Nuclear Facility Quality Assurance Program Description," Revision 30
- 5.2 ML031110271, NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995
- 5.3 ML18060A266, Exelon Generation Letter RS-17-161, TMI-17-106, "Exelon Fleet License Amendment Request to Relocate Technical Specification Unit/Facility/Plant Staff Qualification ANSI N18.1-1971 and ANSI/ANS-3.1-1978 Requirements to the Exelon Quality Assurance Topical Report (QATR)," dated March 1, 2018
- 5.4 ML18206A282, NRC Letter, "Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and Three Mile Island Nuclear Station, Unit 1 - Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018- LLA-0053)," dated August 2, 2018