

PMSummerColpEM Resource

From: KIBLER, TRIA K [TKKIBLER@scana.com]
Sent: Thursday, June 24, 2010 5:07 PM
To: conrad.burnside@DHS.gov; Sebrosky, Joseph; McGovern, Denise; BYRNE, STEPHEN A; ARCHIE, JEFFREY B; CLARY, RONALD B; 'bmccall@santecooper.com'; CHERRY, WILLIAM; MAHAN, RANDOLPH R; KSutton@morganlewis.com; MONROE, AMY; WILLIAMSON, ROBERT E; dpatton@bechtel.com; hughesfp@westinghouse.com; hutchiwe@westinghouse.com; william.fox@shawgrp.com; grayson.young@shawgrp.com; Document Control Records Management
Subject: Response to FEMA RAI's
Attachments: NND-10-0241.PDF

Hearing Identifier: VCSummer_COL_Public
Email Number: 359

Mail Envelope Properties (6ACADB15905F9C41B2FB8297CEB500500B30C05623)

Subject: Response to FEMA RAI's
Sent Date: 6/24/2010 5:06:48 PM
Received Date: 6/24/2010 5:07:03 PM
From: KIBLER, TRIA K

Created By: TKKIBLER@scana.com

Recipients:

"conrad.burnside@DHS.gov" <conrad.burnside@DHS.gov>
Tracking Status: None
"Sebrosky, Joseph" <Joseph.Sebrosky@nrc.gov>
Tracking Status: None
"McGovern, Denise" <Denise.McGovern@nrc.gov>
Tracking Status: None
"BYRNE, STEPHEN A" <SBYRNE@scana.com>
Tracking Status: None
"ARCHIE, JEFFREY B" <JARCHIE@scana.com>
Tracking Status: None
"CLARY, RONALD B" <RCLARY@scana.com>
Tracking Status: None
"bmccall@santecooper.com" <bmccall@santecooper.com>
Tracking Status: None
"CHERRY, WILLIAM" <WILLIAM.CHERRY@scana.com>
Tracking Status: None
"MAHAN, RANDOLPH R" <RMAHAN@scana.com>
Tracking Status: None
"KSutton@morganlewis.com" <KSutton@morganlewis.com>
Tracking Status: None
"MONROE, AMY" <AMONROE@scana.com>
Tracking Status: None
"WILLIAMSON, ROBERT E" <REWILLIAMSON@scana.com>
Tracking Status: None
"dpatton@bechtel.com" <dpatton@bechtel.com>
Tracking Status: None
"hughesfp@westinghouse.com" <hughesfp@westinghouse.com>
Tracking Status: None
"hutchiwe@westinghouse.com" <hutchiwe@westinghouse.com>
Tracking Status: None
"william.fox@shawgrp.com" <william.fox@shawgrp.com>
Tracking Status: None
"grayson.young@shawgrp.com" <grayson.young@shawgrp.com>
Tracking Status: None
"Document Control Records Management" <DOCCNTRLRECMGMT@scana.com>
Tracking Status: None

Post Office: EXCHANGE02.CORP.SCAN.COM

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June 24, 2010
NND-10-0241

Ms. Vanessa Quinn
U. S. Department of Homeland Security
Federal Emergency Management Agency
500 C Street, SW
Washington, DC 20472

Dear Ms. Quinn,

In a letter dated March 27, 2008, South Carolina Electric & Gas Company (SCE&G) submitted a combined license application (COLA) per the requirements of 10CFR52 to the NRC for two proposed AP1000 nuclear operating units designated as Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3. Working as a cooperative agency with the NRC, FEMA was requested to review the emergency planning aspects of the COLA. Based on that review, a letter from FEMA dated December 24, 2008, was provided to SCE&G that requested additional supporting information on the Emergency Planning Zone (EPZ) proposed for VCSNS Units 2 and 3. Specifically that letter requested that SCE&G, the State of South Carolina, and the affected counties provide clarifying determination to support using the existing Unit 1 EPZ boundary for Units 2 and 3 emergency planning when these units are located approximately one mile southwest of the existing unit.

Based on the FEMA request, additional discussions were held with the State of South Carolina and the affected counties (Fairfield, Newberry, Richland and Lexington). While the existing boundary had been agreed upon by all parties prior to submittal of the COLA, the technical and regulatory aspects of the EPZ determination were again discussed with the officials in each of the jurisdictions.

The existing Unit 1 EPZ consists of an area with an approximate 10 mile radius centered at the Unit 1 containment building. VCSNS Units 2 and 3 are located approximately one mile southwest of Unit 1 on contiguous properties owned by SCE&G. SCE&G considers the property containing the existing operating unit and the proposed Units 2 and 3 to be one homogeneous site. The EPZ boundaries currently in place were based on demography, topography, access routes, etc. and are considered to be the appropriate size and shape for emergency planning purposes. When considering all the different attributes, the established EPZ did not reach out to include an entire 10 mile radius in all cases even for Unit 1. However this boundary has been appropriate for the emergency planning needs of the surrounding areas. Facilities, equipment and emergency planning procedures currently exist to support this EPZ.

SCE&G has utilized the information contained NUREG-0654/FEMA-REP-1, "Criteria for the Preparation and Evaluation of Radiological and Emergency Response Plans and

Preparedness in Support of Nuclear Power Plants”, as well as NUREG-0396/EPA-520, “Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants”, to develop the size and shape of the EPZ for Unit 1, and subsequently Units 2 and 3.

These documents state, in part, the following with regard to determination of the size and shape of the EPZ boundary:

1. NUREG-0396/EPA-520 – *“It is expected that judgment of the planner will be used in determining the precise size and shape of the EPZs considering local conditions such as demography, topography and land use characteristics, access routes, jurisdictional boundaries, and arrangements with the nuclear facility operator for notification and response assistance.”*
2. NUREG-0654/FEMA-REP-1- *“Judgment should be used in adopting this distance based upon considerations of local conditions such as demography, topography, land characteristics, access routes, and local boundaries.”*

Subsequent to additional discussions with the affected counties, each of the counties have passed resolutions to maintain the existing Unit 1 EPZ for the additional Units 2 and 3 (see the attached resolutions). As part of the regulatory guidance for maintaining an effective emergency planning strategy, the local conditions of the surrounding areas will be studied periodically. After these studies, any necessary adjustments to the EPZ for the VCSNS units will be made in conjunction with mutual cooperation and input from the state’s and surrounding counties’ emergency planning organizations. This periodic review helps to ensure the potential changing needs of the areas surrounding the VCSNS site are assessed and communicated with the appropriate personnel from the state and counties.

In summary, as supported by the resolutions from Newberry, Lexington, Richland and Fairfield Counties, and endorsement from the South Carolina Emergency Management Division, the existing VCSNS Unit 1 EPZ is considered appropriate for use in the COLA for the proposed VCSNS Units 2 and 3. SCE&G is committed to ensuring the continued safety and protection of the public due to the operation of the VCSNS site. Continuous re-evaluation, oversight and improvement of the emergency planning activities for the site are viewed as an essential and primary responsibility of SCE&G. SCE&G will continue to work closely with county, state and federal organizations to ensure the emergency planning processes, procedures and facilities necessary to support the needs and best interests of the public are maintained.

Should you have any questions, please contact Mr. Al Paglia by telephone at (803) 345-4191, or by email at apaglia@scana.com.

Sincerely,



Ronald B. Clary
Vice President
New Nuclear Deployment

AMM/RBC/am

Attachments

c Conrad Burnside
Albert Koons
Charles R. Platt
Ernie Moore
Robert Trojanoski
Joseph M. Sebrosky
Denise L. McGovern
Stephen A. Byrne
Jeffrey B. Archie
Ronald B. Clary
Bill McCall
William M. Cherry
Randolph R. Mahan
Kathryn M. Sutton
Amy M. Monroe
Robert E. Williamson
Dan Patton
Fredrick P. Hughes
William Hutchins
William A. Fox
Grayson Young
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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

**A RESOLUTION OF THE
RICHLAND COUNTY COUNCIL**

A RESOLUTION TO REAFFIRM THE RICHLAND COUNTY EMERGENCY PLANNING ZONE (EPZ) FOR TWO NEW POWER PLANTS TO BE BUILT AT THE V.C. SUMMER NUCLEAR STATION IN FAIRFIELD COUNTY

WHEREAS, South Carolina Electric & Gas Company (SCE&G) and the South Carolina Public Service Authority (SCPSA) jointly own the V.C. Summer Nuclear Station for the purpose of generating electric current, a federally licensed nuclear facility located in Fairfield County, South Carolina and

WHEREAS, advance planning is necessary to assure that the health and safety of the public will be protected in the unlikely event of a radiological emergency associated with the operation of said nuclear plant; and

WHEREAS, SCE&G has developed a Virgil C. Summer Nuclear Station Radiation Emergency Plan so that in the unlikely event of an emergency, appropriate federal, state and local government officials are notified and appropriate monitoring and onsite measures are taken to protect the public; and

WHEREAS, Richland County is responsible for the health, safety, security and welfare of its citizen; and

WHEREAS, Richland County has the overall responsibility for emergency preparedness and local response in County concerning an incident at Virgil C. Summer Nuclear Station; and,

WHEREAS, Richland County has prepared a Radiation Emergency Plan for radiological emergencies associated with the operation of Virgil C. Summer Nuclear Station;

WHEREAS, Federal, State and Local governments have established a Plume Exposure Emergency Planning Zone around Unit 1 of the VC Summer Nuclear Station;

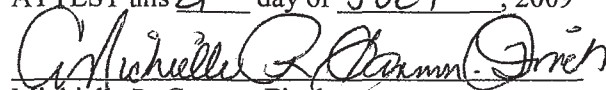
WHEREAS, SCE&G and the SCPSA have notified Richland County of the intent to Construct, Operate and License two Westinghouse AP1000 reactors on the existing VC Summer Nuclear Station site ("VC Summer Units 2 and 3");

NOW, THEREFORE BE IT RESOLVED, by the County Council of Richland County, (the "County Council") as follows:

Section 1: Official Action. Richland County Council continues to support Emergency Planning efforts for the citizens of Richland County in support of VC Summer Nuclear Station Unit 1, as well as the proposed expansion of the Station. It is the intention of the County Council that the existing Plume Exposure Emergency Planning Zone within Richland County, South Carolina, shall be maintained to continue to support Unit 1 and also to support the Construction, Operation and Licensing of the proposed VC Summer Nuclear Station Units 2 and 3.

Adopted in meeting duly assembled on this 21ST day of July 2009.

ATTEST this 21ST day of JULY, 2009


Michelle R. Cannon-Finch
Clerk of Council


Paul Livingston, Chair
Richland County Council

STATE OF SOUTH CAROLINA)
)
COUNTY OF NEWBERRY)

RESOLUTION #09-09

WHEREAS, South Carolina Electric & Gas Company (SCE&G) and the South Carolina Public Service Authority (SCPSA) jointly own the V.C. Summer Nuclear Station, a federally licensed nuclear facility located in Fairfield County, South Carolina, for the purpose of generating electric current; and

WHEREAS, advance planning is necessary to assure that the health and safety of the public will be protected in the unlikely event of a radiological emergency associated with the operation of said nuclear plant; and

WHEREAS, SCE&G has developed a V.C. Summer Nuclear Station Radiation Emergency Plan so that in the unlikely event of an emergency, appropriate federal, state and local government officials are notified and appropriate monitoring and onsite measures are taken to protect the public; and

WHEREAS, Newberry County is responsible for the health, safety, security and welfare of its citizens; and

WHEREAS, Newberry County has the overall responsibility for emergency preparedness and local response in Newberry County concerning an incident at the V.C. Summer Nuclear Station; and,

WHEREAS, Newberry County has prepared a Radiation Emergency Plan for radiological emergencies associated with the operation of the V.C. Summer Nuclear Station;

WHEREAS, Federal, State and Local governments have established a Plume Exposure Emergency Planning Zone around Unit 1 of the V.C. Summer Nuclear Station;

WHEREAS, SCE&G and the SCPSA have notified Newberry County of the intent to Construct, Operate and License two Westinghouse AP1000 reactors on the existing V.C. Summer Nuclear Station ("V.C. Summer Units 2 and 3");

NOW, THEREFORE BE IT RESOLVED, by the County Council of Newberry County, (the "County Council") as follows:

Section 1: Official Action. County Council continues to support Emergency Planning efforts for the citizens of Newberry County in support of V.C. Summer Nuclear Station Unit 1, as well as the proposed expansion of the Station. It is the intention of the County Council that the existing Plume Exposure Emergency Planning Zone shall be maintained to continue to support Unit 1 and also to support the Construction, Operation and Licensing of the proposed V.C. Summer Nuclear Station Units 2 and 3 within Newberry County, South Carolina.

Adopted in meeting duly assembled on this 7th day of October 2009.

NEWBERRY COUNTY COUNCIL

Henry H. Livingston III

Henry H. Livingston, III, Chairman

Laurie N. Renwick

Laurie N. Renwick, Clerk to Council

ATTEST:



STATE OF SOUTH CAROLINA)
)
COUNTY OF FAIRFIELD)

**A RESOLUTION OF THE
FAIRFIELD COUNTY COUNCIL**

**A RESOLUTION TO REAFFIRM THE FAIRFIELD COUNTY EMERGENCY
PLANNING ZONE (EPZ) FOR TWO NEW POWER PLANTS TO BE BUILT AT THE
V.C. SUMMER NUCLEAR STATION IN FAIRFIELD COUNTY**

WHEREAS, South Carolina Electric & Gas Company (SCE&G) and the South Carolina Public Service Authority (SCPSA) jointly own the V.C. Summer Nuclear Station for the purpose of generating electric current, a federally licensed nuclear facility located in Fairfield County, South Carolina and

WHEREAS, advance planning is necessary to assure that the health and safety of the public will be protected in the unlikely event of a radiological emergency associated with the operation of said nuclear plant; and

WHEREAS, SCE&G has developed a Virgil C. Summer Nuclear Station Radiation Emergency Plan so that in the unlikely event of an emergency, appropriate federal, state and local government officials are notified and appropriate monitoring and onsite measures are taken to protect the public; and

WHEREAS, Fairfield County is responsible for the health, safety, security and welfare of its citizen; and

WHEREAS, Fairfield County has the overall responsibility for emergency preparedness and local response in County concerning an incident at Virgil C. Summer Nuclear Station; and,

WHEREAS, Fairfield County has prepared a Radiation Emergency Plan for radiological emergencies associated with the operation of Virgil C. Summer Nuclear Station;

WHEREAS, Federal, State and Local governments have established a Plume Exposure Emergency Planning Zone around Unit 1 of the VC Summer Nuclear Station;

WHEREAS, SCE&G and the SCPSA have notified Fairfield County of the intent to Construct, Operate and License two Westinghouse AP1000 reactors on the existing VC Summer Nuclear Station site ("VC Summer Units 2 and 3");

NOW, THEREFORE BE IT RESOLVED, by the County Council of Fairfield County, (the "County Council") as follows:



Section 1: Official Action. Fairfield County Council continues to support Emergency Planning efforts for the citizens of Fairfield County in support of VC Summer Nuclear Station Unit 1, as well as the proposed expansion of the Station. It is the intention of the

County Council that the existing Plume Exposure Emergency Planning Zone within Fairfield County, South Carolina, shall be maintained to continue to support Unit 1 and also to support the Construction, Operation and Licensing of the proposed VC Summer Nuclear Station Units 2 and 3.

Adopted in meeting duly assembled on this 13th day of July 2009.

A handwritten signature in cursive script, reading "R. David Brown".

R. David Brown, Chairman
Fairfield County Council

A handwritten signature in cursive script, reading "Shryll M. Brown".

Shryll M. Brown
Clerk of Council

RESOLUTION

RESOLUTION IN SUPPORT OF THE EMERGENCY PLANNING FOR THE VC SUMMER NUCLEAR PLAN AND PROPOSED EXPANSION

WHEREAS, South Carolina Electric & Gas Company (SCE&G) and the South Carolina Public Service Authority (SCPSA) jointly own the V. C. Summer Nuclear Station for the purpose of generating electric current, a federally licensed nuclear facility located in Fairfield County, South Carolina; and

WHEREAS, advance planning is necessary to assure that the health and safety of the public will be protected in the unlikely event of a radiological emergency associated with the operation of said nuclear plant; and

WHEREAS, SCE&G has developed a Virgil C. Summer Nuclear Station Radiation Emergency Plan so that in the unlikely event of an emergency, appropriate federal, state and local government officials are notified and appropriate monitoring and onsite measures are taken to protect the public; and

WHEREAS, Lexington County is responsible for the health, safety, security and welfare of its citizens; and

WHEREAS, Lexington County has the overall responsibility for emergency preparedness and local response in Lexington County concerning an incident at Virgil C. Summer Nuclear Station; and

WHEREAS, Lexington County has prepared a Radiation Emergency Plan for radiological emergencies associated with the operation of the Virgil C. Summer Nuclear Station; and

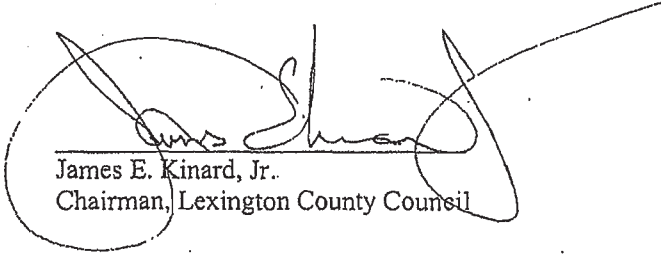
WHEREAS, Federal, State and Local governments have established a Plume Exposure Emergency Planning Zone around Unit 1 of the V. C. Summer Nuclear Station; and

WHEREAS, SCE&G and the SCPSA have notified Lexington County of the intent to Construct, Operate and License two Westinghouse AP1000 reactors on the existing V. C. Summer Nuclear Station ("VC Summer Units 2 and 3").


NOW, THEREFORE, BE IT RESOLVED by the County Council for the County of Lexington, South Carolina as follows:

Section 1: Official Action. Lexington County Council continues to support Emergency Planning efforts for the citizens of Lexington County in support of V. C. Summer Nuclear Station Unit 1, as well as the proposed expansion of the Station. It is the intention of the County Council that the existing Plume Exposure Emergency Planning Zone shall be maintained to continue to support Unit 1 and also to support the Construction, Operation, and Licensing of the proposed V. C. Summer Nuclear Station Units 2 and 3 within Lexington County, South Carolina.

Adopted in meeting duly assembled on 15 day of June 2010.


James E. Kinard, Jr.
Chairman, Lexington County Council

ATTEST:


Diana W. Burnett, Clerk

**MEMORANDUM OF UNDERSTANDING BETWEEN
SOUTH CAROLINA ELECTRIC & GAS COMPANY
AND
THE SOUTH CAROLINA EMERGENCY MANAGEMENT DIVISION**

THIS MEMORANDUM OF UNDERSTANDING made and entered into as of the 8th day of December, 2009, by and between South Carolina Electric & Gas Company (SCE&G), a South Carolina Corporation having its principal place of business in Cayce, South Carolina, and The South Carolina Emergency Management Division (SCEMD).

WITNESSETH:

WHEREAS, South Carolina Electric & Gas Company (SCE&G) and the South Carolina Public Service Authority (SCPSA) jointly own the V.C. Summer Nuclear Station for the purpose of generating electric current, a federally licensed nuclear facility located in Fairfield County, South Carolina and

WHEREAS, advance planning is necessary to assure that the health and safety of the public will be protected in the unlikely event of a radiological emergency associated with the operation of said nuclear plant; and

WHEREAS, SCE&G has developed a Virgil C. Summer Nuclear Station Radiation Emergency Plan (the "SCE&G Plan") so that in the unlikely event of an emergency, appropriate federal, state and local government officials are notified and appropriate monitoring and onsite measures are taken to protect the public; and

WHEREAS, Federal, State and Local governments have established a Plume Exposure Emergency Planning Zone (the "Zone") around Unit 1 of the VC Summer Nuclear Station, ("Unit 1");

WHEREAS, SCE&G and the SCPSA have notified the State of South Carolina of the intent to construct, operate and license two additional Westinghouse AP1000 reactors on the existing VC Summer Nuclear Station ("VC Summer Units 2 and 3");

NOW, THEREFORE BE IT RESOLVED, by this memorandum of understanding that:

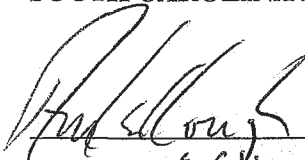
Section 1: Official Action

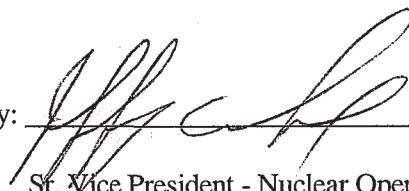
- 1) SCEMD supports emergency planning efforts for the citizens of South Carolina in association with VC Summer Nuclear Station Unit 1, as well as the proposed expansion of the VC Summer Station Units 2 and 3. It is the intention of SCEMD that the current Plume Exposure Emergency Planning Zone shall be maintained as is to support Unit 1. It is also the intention of SCEMD to support the VCS emergency plans review process by the NRC for the purpose of construction and licensing of VC Summer Units 2 and 3 within Lexington, Richland, Newberry and Fairfield Counties, South Carolina and for the operation thereof with respect to follow-on discussions and resolution surrounding the Plume Emergency Planning Zone (EPZ) expansion that impacts the residents of the above South Carolina Counties, as follows:
 - a. SCEMD and SCE&G, namely VC Summer Nuclear Station, agree to meet after licensing, but before operation of VC Summer Units 2 and 3, with representatives of the South Carolina Department of Health and Environmental Control (DHEC), the Federal Emergency Management Agency (FEMA) and Lexington County to

review fully the adequacy of the VC Summer emergency plan, specifically the issue of the possible need to expand the current Plume EPZ within Lexington County, South Carolina. This shall occur prior to the scheduled federally required 350 Certification and operational date for VC Summer Units 2 and 3. This review and its findings shall be the basis for determining whether all parties agree to or not agree to expansion of the current Plume Exposure EPZ for Unit 1 with regard to the two additional Westinghouse AP 1000 reactors, Units 2 and 3 of the VC Summer Nuclear Station site. Any actions identified during this review will be performed in a manner and timeliness agreed upon by all parties at the time the review is completed.

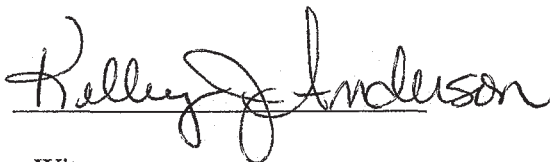
IN WITNESS WHEREOF, the parties hereto have executed this Memorandum of Understanding by their duly authorized representatives of the date first above written.

SOUTH CAROLINA ELECTRIC & GAS COMPANY

 12/8/09
T.F. Mc Cullough
Witness

By: 
St. Vice President - Nuclear Operations Division

SOUTH CAROLINA EMERGENCY MANAGEMENT DIVISION


Witness

By: 
Director- SC Emergency Management Division