



Thomas D. Gatlin
Vice-President Nuclear Operations
(803)345-4342

June 8, 2012
RC-12-0082

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

Dear Sir/Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
SOUTH CAROLINA ELECTRIC & GAS (SCE&G) 90-DAY
RESPONSE TO EMERGENCY PREPAREDNESS INFORMATION
REQUESTED BY THE NRC FOR INFORMATION PURSUANT TO
TITLE 10 OF THE CODE OF FEDERAL REGULATIONS 50.54(f)
REGARDING RECOMMENDATIONS 2.1, 2.3 and 9.3 OF THE NEAR
TERM TASK FORCE REVIEW OF INSIGHTS FROM THE FUKUSHIMA
DAI-ICHI ACCIDENT

- References:
1. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near Term Task Force (NTTF) Review of Insights from the Fukushima Dai-Ichi Accident; dated March 12, 2012
 2. South Carolina Electric & Gas (SCE&G) 60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident; dated May 9, 2012

On March 12, 2012, the NRC staff issued reference 1. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

In accordance with the reference 1, on May 9, 2012, South Carolina Electric & Gas Company (SCE&G) acting for itself and as an agent for South Carolina Public Service Authority, submitted an alternative course of action for providing the requested information (reference 2). The alternative course of action included revised information due dates and the basis for those dates. Consistent with this alternative course of

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action, enclosed is our response to the information requested in enclosure 5 of reference 1:

- Communications request #2
- Staffing request #3
- Staffing request #4
- Staffing request #5

The new commitments contained in this submittal are summarized in Enclosure 2.

Should you have questions concerning the content of this letter, please contact Bruce Thompson at (803) 931-5042.

I declare under penalty of perjury that the foregoing is true and correct.

6-8-12
Executed on

Tom D. Gatlin
Thomas D. Gatlin

CL/TDG/ts
Enclosures (2)

c: K. B. Marsh
S. A. Byrne
J. B. Archie
N. S. Carns
J. H. Hamilton
R. J. White
W. M. Cherry
E. J. Leeds
V. M. McCree
R. E. Martin
NRC Resident Inspector
K. M. Sutton
NSRC
RTS (CR-12-01101, CR-12-01102)
File (815.07)
PRSF (RC-12-0082)

Request for Information (RFI) 90-Day Emergency Preparedness Response

Communications:

RFI 2 – Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Since the events of Fukushima on March 11, 2011, VCSNS has taken a proactive approach to enhance our means of communication after a catastrophic loss of all primary communications systems and power supplies.

- Sixteen (16) portable battery operated satellite phones, including batteries, charging stations and supporting equipment have been purchased. This equipment is for emergency response personnel to facilitate onsite and offsite communications when primary plant communication systems are inoperable. All phones and supporting equipment are currently on site and are accounted for by Emergency Services personnel.
- Seven (7) portable 6500w diesel powered generators dedicated to plant communications systems and support equipment have been purchased. This equipment will provide back-up power for electrical loads supporting back-up communications and response actions. All generators are currently on site and are accounted for by Emergency Services personnel.
- Purchase orders have been placed for one (1) trailer-mounted portable 100 foot radio tower with an onboard 5.5kw generator and fuel system, and four (4) radio repeaters supporting Security, Operations, and Emergency Response team's radio systems.
- A purchase order has been placed for one (1) trailer-mounted portable 80kw, diesel powered generator.
- Training will be developed for the setup and operation of this new equipment. The training will be conducted for selected emergency response personnel assigned to Shift duties and to selected personnel assigned to the Operations Support Center. This training will be completed by October 30, 2012.

Staffing:

RFI 3 – Identify how the augmented staff would be notified given degraded communications capabilities.

VCSNS Station Administrative procedure SAP-127 Revision 3, "Emergency Preparedness," Attachment VI, provides the expectation for Emergency Response Organization (ERO) personnel to respond to their assigned emergency response facilities when notified of an event. In the event of an area-wide loss-of-grid event prohibiting communications, the expectation is for ERO personnel to gain awareness of the event via direct observation, media reports, word of mouth, etc. This practice has been communicated to ERO responders, and will be included in the 2012 ERO annual requalification training.

RFI 4 – Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

Various methods of transportation to VCSNS are applicable, including walking and use of personal vehicles. SCE&G currently has Memorandums of Understanding (MOU) and Letters of Agreement (LOA) with the South Carolina Emergency Management Division (SCEMD) and the counties of Fairfield, Lexington, Newberry, and Richland. These entities have agreed to provide support to VCSNS in the event of a large-scale natural disaster inhibiting site access. SCEMD is the central coordinating agency for mutual aid in South Carolina for all state and local resources.

VCSNS will also utilize the Nuclear Regulatory Commission (NRC) to coordinate the response of all available federal resources.

In addition to the Memorandums of Understanding and Letters of Agreement with state agencies and local agencies, SCE&G is evaluating agreement(s) with private organizations to transport emergency responders to the site in the event of a large-scale natural disaster that inhibits site access. SCE&G is evaluating staging areas to be used by emergency responders. SCE&G anticipates completing the evaluations and establishing agreements by October 30, 2012.

The following agreements are already in place for assistance and/or services:

- The State of South Carolina Emergency Management Division (This letter includes the South Carolina Department of Health and Environmental Control.)
- The County of Newberry
- The County of Lexington
- The County of Richland
- The County of Fairfield
- Fairfield County Emergency Medical Services
- Lexington County Emergency Medical Services
- The Department of Energy, Savannah River Office
- The Institute of Nuclear Power Operations
- Jenkinsville - Monticello - Horeb Volunteer Fire Department
- Greenbrier - Bethel Volunteer Fire Department
- Blair Volunteer Fire Department
- Feasterville Volunteer Fire Department
- Lebanon Volunteer Fire Department
- Community Volunteer Fire Department
- Columbia Metropolitan Airport Fire and Rescue

RFI 5 – Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

SCE&G is currently assessing initial on-shift ERO staffing at VCSNS for event conditions in response to the requirements of changes to 10 CFR Parts 50, Appendix E, Section 4(a)(i). Interim actions if required, will be established by the completion of this assessment.

List of Regulatory Commitments

The following table identifies those actions committed to by South Carolina Electric & Gas in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	SCHEDULED COMPLETION DATE (If Required)
Develop training on the setup and operation of new communications equipment. This training will be conducted for selected emergency response personnel assigned to Shift duties and to selected personnel assigned to the Operations Support Center.	October 30, 2012
Evaluate establishing agreements with private organizations to transport emergency responders to the site in the event of an emergency. Evaluate establishing staging areas to be used by emergency responders.	October 30, 2012