



Alfred M. Paglia
Manager
New Nuclear Licensing

March 12, 2014
NND-14-0123
10 CFR 52.97

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

Subject: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Docket Numbers 52-027 and 52-028
Operational Program Implementation Schedule in Accordance With License
Conditions 2.D.(11) and 2.D.(12)(e)

Reference: 1. Letter from Alan J. Blamey to Ronald B. Clary related to the V.C. Summer
Nuclear Station, Units 2 and 3, Submittal of Construction Schedule Information,
dated November 19, 2009 (ML093240261)

2. Letter from Ronald A. Jones to NRC, Operational Program Implementation
Schedule in Accordance With License Conditions 2.D.(11) and 2.D.(12)(e), dated
September 13, 2013 (ML13259A148)

In accordance with License Conditions 2.D.(11) and 2.D.(12)(e) of Combined Licenses (COLs)
NPF-93 and NPF-94, South Carolina Electric & Gas (SCE&G) is submitting an updated
Operational Program Implementation Schedule for Virgil C. Summer Units 2 and 3.

SCE&G has included the information in accordance with these license conditions as Enclosure
3 to this letter. The enclosed schedule shall be updated every 6 months until 12 months before
scheduled fuel loading, and every month thereafter until each license condition has been fully
implemented.

Enclosure 3 contains confidential commercial information. Portions of Enclosure 3 are also
considered proprietary (i.e., a trade secret) to both Westinghouse Electric Company, LLC
(Westinghouse) and Chicago Bridge & Iron (CB&I) and was determined to be treated as such
by the NRC in Reference 1. SCE&G requests that the specified information be withheld from
public disclosure in accordance with 10 CFR 2.390. In support of this request, SCE&G has
enclosed the following:

- Enclosure 1: Affidavit for Withholding SCE&G's Information Under 10CFR 2.390
- Enclosure 2: Redacted (public) Version of V.C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With License Conditions
2.D.(11) and 2.D.(12)(e)
- Enclosure 3: Non-redacted (non-public) Version of V.C. Summer Nuclear Station Units
2 and 3 Operational Program Implementation Schedule in Accordance With License
Conditions 2.D.(11) and 2.D.(12)(e)
- Enclosure 4: Confidential Commercial Information Notice

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The redacted version of VCSNS Units 2 and 3 Operational Program Implementation Schedule is provided in Enclosure 2 and is suitable for public disclosure.

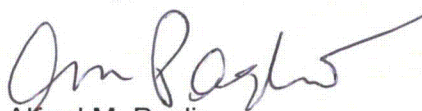
This letter contains no NRC commitments.

Should you have any questions, please contact me by telephone at (803) 941-9876, or by email at apaglia@scana.com.

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

Executed on this 12 day of March 2014.

Sincerely,



Alfred M. Paglia
Manager
New Nuclear Licensing

BB/AMP/bb

Enclosure 1: Affidavit for Withholding SCE&G's Information Under 10CFR 2.390

Enclosure 2: Redacted (public) Version of V.C. Summer Nuclear Station Units 2 and 3 Operational Program Implementation Schedule in Accordance With License Conditions 2.D.(11) and 2.D.(12)(e)

Enclosure 3: Non-redacted (non-public) Version of V.C. Summer Nuclear Station Units 2 and 3 Operational Program Implementation Schedule in Accordance With License Conditions 2.D.(11) and 2.D.(12)(e)

Enclosure 4: Confidential Commercial Information Notice

c (with enclosures):

Glenn Tracy – Director NRO
Victor McCree – Region II Regional Administrator
Stephen A. Byrne – SCE&G
Jeffrey B. Archie – SCE&G
Ronald A. Jones – SCE&G
Alvis J. Bynum – SCE&G
Claude Laney – SCE&G
Al Paglia – SCE&G
April Rice – SCE&G
Ken Hollenbach – CB&I Stone & Webster
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Rahsean Jackson – Unit 2/3 NRC Resident Inspector
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Curtis Castell – CB&I Stone & Webster
Chuck Baucom - CB&I Stone & Webster
AJ Marciano – CB&I Stone & Webster
Daniel Churchman – Westinghouse
Christopher Levesque - Westinghouse
Brian McIntyre – Westinghouse
Tom Geer – Westinghouse
Michael Frankle – Westinghouse
Marion Cherry - Santee Cooper
Kathryn M. Sutton – Morgan Lewis

South Carolina Electric & Gas

Enclosure 1 to Letter NND-14-0123

Affidavit for Withholding SCE&G's Information

Prepared in Accordance with 10 CFR 2.390

Affidavit of Alfred M Paglia

1. My name is Alfred M. Paglia. I am the Manager, New Nuclear Licensing, for South Carolina Electric & Gas Company (SCE&G). I have been delegated the function of reviewing proprietary information sought to be withheld from public disclosure and am authorized to apply for its withholding on behalf of SCE&G.
2. I am making this affidavit on personal knowledge, in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with SCE&G's filings on dockets 52-027 and 52-028, Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3. I have personal knowledge of the criteria and procedures used by SCE&G to designate information as a trade secret, privileged or as confidential, commercial or financial information.
3. In accordance with 10 C.F.R. §2.390, I am making this Affidavit to support SCE&G's request for withholding, contained in the letter accompanying this Affidavit. The specific information to be withheld is contained in Enclosure 3, Non-redacted Version of V.C. Summer Nuclear Station Units 2 and 3 Operational Program Implementation Schedule in Accordance With License Conditions 2.D.(11) and 2.D.(12)(e).
4. The information is sought to be withheld under 10 C.F.R. §2.390(a)(4), as it is confidential commercial information. In support of this request for withholding and pursuant to 10 C.F.R. §2.390(b)(4), I state the following:

- i. SCE&G has held the information in confidence.
- ii. This information is of a type customarily held in confidence by SCE&G.
- iii. This information is being transmitted to the NRC in confidence.
- iv. This information is not available in public sources.
- v. The public disclosure of the information sought to be withheld is likely to cause substantial harm to SCE&G's competitive position. The information sought to be withheld contains aspects of SCE&G's development plans, the release of which will likely cause harm by allowing other entities to gain a competitive advantage through prior knowledge of SCE&G's construction and procurement plans.

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


Alfred M. Paglia

Executed on 3/12/14
Date

SWORN and SUBSCRIBED to before me on this 12th day of March, 2014 in
Fairfield County, South Carolina


Notary Public
My Commission Expires: 6/18/2018

South Carolina Electric & Gas

Enclosure 2 to Letter NND-14-0123

Redacted Version of V.C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12)(e)

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
1	Inservice Inspection Program	2.0		5.2.4, 5.4.2.5, 6.6	Implement prior to Commercial service. Unit 2: [] Unit 3: []	[]	[]
2	Inservice Testing Program	3.0		3.9.6, 5.2.4	Program will be fully implemented by generator online on nuclear heat. Appropriate portions of the program are implemented to support system operability requirements of technical specifications. Unit 2: [] Unit 3: []	[]	[]
3	Environmental Qualification Program	13.0	2.D.(10) (a)	3.11	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]
4	Preservice Inspection Program	1.0		5.2.4, 5.4.2.5, 6.6	Completion prior to initial plant start-up. Unit 2: [] Unit 3: []	[]	[]
5	Reactor Vessel Material Surveillance Program	18.0	2.D.(10) (b)	5.3.2.6	Prior to initial criticality. Unit 2: [] Unit 3: []	[]	[]
6	Preservice Testing Program	526.0	2.D. (10) (c)	3.9.6	Complete prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]
7	Containment Leakage Rate Testing Program	3.1	2.D.(10) (d)	6.2.5.1	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
8	Fire Protection Program	24.0	2.D.(10) (e)	9.5.1.8	Prior to receipt of fuel onsite. Unit 2: [] Unit 3: []	[]	[]
	> portions applicable to radioactive material				Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18). SNM Receipt: [] Byproduct/Src Material Receipt: []	[]	[]
9	Process and Effluent Monitoring and Sampling Program:						
	Radiological Effluent Technical Specifications/Standard Radiological Effluent Controls	Effluent Procedures	2.D.(10) (f)	11.5	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]
	Offsite Dose Calculation Manual	36.2	2.D.(10) (g)	11.5	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]
	Radiological Environmental Monitoring Program	Environmental Monitoring Procedures	2.D.(10) (h)	11.5	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]
	Process Control Program	Rad Waste Processing Procedures	2.D.(10) (i)	11.4	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
10	Radiation Protection Program (including ALARA principle)	Health Physics Procedures	2.D.(10) (j)	12.1, 12.5			
	> ² Radioactive Source Control		2.D.(10) (j) 1.		1. Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18). SNM Receipt: [] Byproduct/Source Material Receipt: []	[]	[]
	> ² Assignment of RP Supervisor		2.D.(10) (j) 2.		2. Prior to receipt of fuel onsite Unit 2: [] Unit 3: []	[]	[]
	> Minimization of Contamination		2.D.(10) (j) 2.		2. Prior to receipt of fuel onsite	[]	[]
	> Personnel Dosimetry		2.D.(10) (j) 2.		2. Prior to receipt of fuel onsite	[]	[]
	> ² Radiation Monitoring and Surveys		2.D.(10) (j) 2.		2. Prior to receipt of fuel onsite	[]	[]
	> Radiation Work Permits		2.D.(10) (j) 2.		2. Prior to receipt of fuel onsite	[]	[]
	> Assignment of RP Manager		2.D.(10) (j) 3.		3. Prior to initial fuel load Unit 2: [] Unit 3: []	[]	[]
	> Respiratory Protection		2.D.(10) (j) 3.		3. Prior to initial fuel load	[]	[]
	> Bioassay		2.D.(10) (j) 3.		3. Prior to initial fuel load	[]	[]
	> Effluents and Environmental Monitoring		2.D.(10) (j) 3.		3. Prior to initial fuel load.	[]	[]
	> Job Coverage		2.D.(10) (j) 3.		3. Prior to initial fuel load	[]	[]
	> Radioactive Waste Shipping		2.D.(10) (j) 4.		4. Prior to first shipment of radioactive waste	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
11	Non Licensed Plant Staff Training Program			13.2	18 months prior to scheduled date of initial fuel load. Unit 2: [] Unit 2: []		
	> Mechanical Maintenance				18 months prior to scheduled date of initial fuel load.	[]	[]
	> I & C Accredited Training				18 months prior to scheduled date of initial fuel load.	[]	[]
	> Chemistry				18 months prior to scheduled date of initial fuel load.	[]	[]
	> Electrical Maintenance				18 months prior to scheduled date of initial fuel load.	[]	[]
	> Radiation Protection				18 months prior to scheduled date of initial fuel load.	[]	[]
	> ² Radiation Protection				Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18). SNM Receipt: [] Byproduct/Src Material Receipt: []	[]	[]
	> ³ Non Licensed Operator Accredited Training				18 months prior to scheduled date of initial fuel load.	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
12	³ Reactor Operator Training Program		2.D.(10) (k)	13.2	18 months prior to scheduled date of initial fuel load. Unit 2: [] Unit 2: []		
	> Senior Reactor Operator					[]	[]
	> Shift Manager					[]	[]
	> Shift Technical Advisor					[]	[]
	> Reactor Operator					[]	[]
13	³ Reactor Operator Requalification Program			13.2	Within 3 months after the date the Commission makes the finding under 10 CFR 52.103(g). Dates Below are 10 CFR 52.103(g) dates plus 3 months. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
14	Emergency Planning			13.3	Full participation exercise conducted within 2 years of scheduled date for initial loading of fuel. Unit 2: [] Unit 3: []	[]	[]
	> Onsite Graded Exercise				Onsite exercise conducted within 1 year before the schedule date for initial loading of fuel. Unit 2: [] Unit 3: []	[]	[]
	> EP Procedures				Applicant's detailed implementing procedures for its emergency plan submitted at least 180 days prior to scheduled date for initial loading of fuel. Unit 2: [] Unit 3: []	[]	[]
	> Emergency Response Data System (ERDS) Implementation Program				Applicant's ERDS Implementation program submitted at least 180 days prior to scheduled date for initial loading of fuel. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
15	⁴ Security Program						
	> Physical Protection Program for SNM (excluding fuel) prior to protected area being declared operational	Nuclear Protection Services (NPS) Procedures	2.D.(10) (o)		Prior to initial receipt of special nuclear material. SNM Receipt: []	[]	[]
	> Physical Protection Program (applicable to protection of fuel SNM prior to the protected area being declared operational)	NPS Procedures	2.D.(10) (o)	13.5.2.2.8, 13.6	Prior to initial receipt of fuel. Unit 2: [] Unit 3: []	[]	[]
	> Physical Security Program	NPS Procedures		13.6	Prior to receipt of fuel onsite (protected area)	[]	[]
	> Safeguards Contingency Program	NPS Procedures		13.6	Prior to receipt of fuel onsite (protected area)	[]	[]
	> Training and Qualification Program	NPS Procedures		13.6	Prior to receipt of fuel onsite (protected area)	[]	[]
16	Quality Assurance Program – Operation			17.5	COL issuance	[]	[]
17	Maintenance Rule	4.0		17.6	Prior to fuel load authorization per 10 CFR 52.103(g). Unit 2: [] Unit 3: []	[]	[]
18	Motor-Operated Valve Testing	106.0	2.D.(10) (I)	3.9.6.2.2	Prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
19	Initial Test Program	11.0	2.D.(10) (m)	14.2			
	Startup Administrative Manual, Pre-operational Test Procedures, and Startup Procedures		2.D.(12) (e) 9.	14.2	Before initiating the Initial Test Program. Unit 2: [] Unit 3: []	[]	[]
	⁵ Construction Test Program		2.D.(10) (m) 1.		Construction Test Program implemented prior to the first construction test. Unit 2: [] Unit 3: []	[]	[]
	Preoperational Test Program		2.D.(10) (m) 2., 2.D.(12) (e) 9.		Preoperational Test Program implemented prior to the first preoperational test. Unit 2: [] Unit 3: []	[]	[]
	Startup Test Program		2.D.(10) (m) 3., 2.D.(12) (e) 9.	14.2.3	Startup Test Program implemented prior to initial fuel load. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
20	Fitness For Duty Program			13.7			
	Fitness for Duty (FFD) Program for Construction (workers and first-line supervisors)			13.7	Prior to initiating 10 CFR Part 26 construction activities	[]	[]
	FFD Program for Construction (management and oversight personnel)			13.7	Prior to initiating 10 CFR Part 26 construction activities	[]	[]
	FFD Program for Security Personnel			13.7	Prior to initiating 10 CFR Part 26 construction activities	[]	[]
	FFD Program for Operations Security Personnel				Prior to the earlier of: A. Licensee's receipt of SNM in the form of fuel assemblies, or B. Establishment of a protected area, or ⁶ C. The 10 CFR 52.103(g) finding	[]	[]
	FFD Program for FFD Program personnel			13.7	Prior to initiating 10 CFR Part 26 construction activities	[]	[]
	FFD Program for persons required to physically report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF)			13.7	Prior to the conduct of the first full participation emergency preparedness exercise under 10 CFR Part 50, App. E, Section F.2.a	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
	FFD Program for Operation			13.7	Prior to the earlier of: A. Establishment of a protected area, or ⁶ B. The 10 CFR 52.103(g) finding	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
21	Cyber Security Program	12.0		13.6	Prior to receipt of fuel onsite (protected area). Unit 2: [] Unit 3: []	[]	[]
22	Special Nuclear Material (SNM) Control and Accounting Program	62.0	2.D.(10) (n)	13.5.2.2.9	Prior to receipt of special nuclear material. SNM Receipt: []	[]	[]
23	Construction and Inspection Procedure for Steel Concrete Composite		2.D.(12) (e) 1.		Prior to steel concrete composite (SC) construction activities for seismic Category I nuclear island modules (including shield building SC modules) described in DCD Rev. 19, Section 3.8.4.8.	[]	[]
24	Metamic Monitoring Program	63.0	2.D.(12) (e) 2.		Before initial fuel load. Unit 2: [] Unit 3: []	[]	[]
25	Flow Accelerated Corrosion Program	15.0	2.D.(12) (e) 3.		Before initial fuel load. Unit 2: [] Unit 3: []	[]	[]
26	Turbine Maintenance and Inspection Program	124.0	2.D.(12) (e) 4.		Before initial fuel load. Unit 2: [] Unit 3: []	[]	[]

V. C. Summer Nuclear Station Units 2 and 3
Operational Program Implementation Schedule in Accordance With
License Conditions 2.D.(11) and 2.D.(12) (e)

Item #	Program Title	SCE&G Program #	COL Condition Section	FSAR Section	¹ Milestone	Unit 2 Implementation Date	Unit 3 Implementation Date
27	Document of Instrument Uncertainties to Calculate Power Calorimetric Uncertainty		2.D.(12) (e) 5.		Before initial fuel load. Unit 2: [] Unit 3: []	[]	[]
28	Admin Controls to Implement Maintenance and Contingency Activities Related to Calorimetric Uncertainty		2.D.(12) (e) 6.		Before initial fuel load. Unit 2: [] Unit 3: []	[]	[]
29	Severe Accident Management Guidelines (SAM-G)		2.D.(12) (e) 7.		Before Startup testing. Unit 2: [] Unit 3: []	[]	[]
30	Loss of Large Area	31.0	2.D.(12) (e) 8.		Before initial fuel load. Unit 2: [] Unit 3: []	[]	[]

1: Milestone dates provided based on [] schedule information.

2: Training necessary to implement Item 10, *Radioactive Source Control*, will be implemented consistent with the date for that item.

3: Operations Training Program accredited by INPO in 10/2012.

4: Force on Force Unit 2: []; Unit 3 [].

5: Start of component testing within the Initial Test Program.

6: Receive 10 CFR 52.103(g) Finding from NRC: Unit 2 = []; Unit 3 = [].

South Carolina Electric & Gas

Enclosure 4 to Letter NND-14-0123

Confidential Commercial Information Notice

CONFIDENTIAL COMMERCIAL INFORMATION NOTICE

Transmitted herewith are confidential commercial information and/or non-confidential commercial information versions of documents furnished to the NRC in connection with the V.C. Summer Nuclear Station Units 2 and 3 Operational Program Implementation Schedule.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of confidential commercial information so submitted to the NRC, the information which is confidential commercial information in the non-public version is contained within brackets, and where the confidential commercial information has been deleted in the public version, only the brackets remain (the information that was contained within the brackets in the public version having been deleted). The justification for claiming the information so designated as confidential commercial information is indicated in Enclosure 1, Affidavit for Withholding for SCE&G's Information accompanying this transmittal pursuant to 10 CFR 2.390(b)(1) and Reference 1 (ML093240261).

,