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Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Combined License Nos. NPF-93 and NPF-94
Docket Nos. 52-027 & 52-028

Subject: South Carolina Electric & Gas Company (SCE&G), VCSNS Units 2&3
Submittal of Six (6) Month Status Report Regarding Implementation of
the Overall Integrated Plan for Mitigation Strategies for Beyond Design
Basis External Events

Reference: 1. Combined Operating License (COL) Numbers NPF-93 and NPF-94

2. Virgil C. Summer Nuclear Station Units 2&3 Overall Integrated Plan with
Regard to Mitigation Strategies for Beyond Design Basis External Events
Pursuant to License Condition 2.D(13) "Mitigation Strategies for Beyond
Design Basis External Events" of Combined License (COL) Numbers
NPF-93 and NPF-94 Dated August 21, 2013 (Accession Number
ML13234A519)

On March 30, 2012 the Nuclear Regulatory Commission (NRC) issued Combined Operating License numbers NPF-93 and NPF-94 (Reference 1) to SCE&G for the Virgil C. Summer Nuclear Station Units 2&3 respectively. License condition 2.D(13) of Reference 1 requires SCE&G to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment and spent fuel pool capabilities in the event of a beyond-design-basis event.

In August, 2013, pursuant to license condition 2.D(13)(3), SCE&G submitted Reference 2 to the NRC. This Overall Integrated Plan identified the activities required to fulfill license condition 2.D(13) and identified milestones associated with implementation of the plan in Enclosure 3.

Pursuant to license condition 2.D(13)(f)(4) of Reference 1, SCE&G hereby submits the enclosed six (6) month status report regarding implementation of the Overall Integrated Plan.

This letter contains no regulatory commitments.

Should you have any questions, please contact Justin Bouknight, Supervisor, Nuclear Licensing, by telephone at (803) 941-9828, or by email at justin.bouknight@scana.com

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

Executed on this 15th day of August, 2014.

Sincerely,



April R. Rice
Manager, Nuclear Licensing
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DK/ARR/dk

Enclosure 1: Six (6) Month Status Report Regarding Implementation of the Overall Integrated Plan for Mitigation Strategies for Beyond Design Basis External Events

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South Carolina Electric & Gas Company

Virgil C. Summer Nuclear Station Units 2&3

NND-14-0466

Enclosure 1

Six (6) Month Status Report Regarding Implementation

of the

Overall Integrated Plan for Mitigation Strategies

for Beyond Design Basis External Events

1 Introduction

Virgil C. Summer Nuclear Station Units 2&3 developed an Overall Integrated Plan, Reference 2, documenting the diverse and flexible strategies (FLEX) developed to maintain or restore core cooling, containment and spent fuel pool cooling capabilities following a beyond design basis external event in response to license condition 2.D(13) of Reference 1. The status report in this enclosure provides a six (6) month update of milestone accomplishments since submittal of the Overall Integrated Plan pursuant to license condition 2.D(13)(f)4 of Reference 1.

2 Milestone Accomplishments

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since SCE&G submittal of the Overall Integrated Plan, Reference 2, and are current as of August 15, 2014:

- None

3 Milestone Schedule Status

The following table provides an update to information contained in Enclosure 3 of the Overall Integrated Plan, Reference 2. It provides the activity status of each item, and whether the expected completion date has changed from that submitted in Reference 2. The dates are planning dates subject to change as design and implementation details are developed, however, any revision to milestone target completion dates does not impact the final implementation date.

Activity	Activity Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct. 2012	Complete	N/A
Submit Overall Integrated Plan	Aug. 2013	Complete	N/A
Submit 6 Month Status Report	Feb. 2014	Complete	N/A
Submit 6 Month Status Report	Aug. 2014	Complete (See Sec. 2)	N/A
Submit 6 Month Status Report	Feb. 2015	Not Started	
Submit 6 Month Status Report	Aug. 2015	Not Started	
Staffing Analysis Completed	Oct. 2015	Not Started	
Ensure Operational Procedures include necessary information	Dec. 2015	Not Started	
Develop Response Plan with RRC	Dec. 2015	Not Started	
Initiate Phase 3 Equipment Procurement	Jan. 2016	Not Started	
Submit 6 Month Status Report	Feb. 2016	Not Started	
Submit 6 Month Status Report	Aug. 2016	Not Started	
Training completed for the Phase 3 FLEX strategies	Sep. 2016	Not Started	
RRC Operational for V.C. Summer 2&3	Sep. 2016	Not Started	
Demonstration for Unit 2	Dec. 2016	Not Started	
Demonstration for Unit 3	Dec. 2016	Not Started	

Six Month Status Report Regarding Implementation of the Overall Integrated Plan

Submit 6 Month Status Report & Completion Report for Unit 2	Feb. 2017	Not Started	
Submit Completion Report for Unit 3	Feb. 2017	Not Started	

Unit 2 - Full compliance prior to fuel load

Unit 3 - Full compliance prior to fuel load

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 2).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Virgil C. Summer Nuclear Station Units 2&3 expect to complete implementation of the requirements of license condition 2.D(13) prior to fuel load pursuant to 2.D(13)(f) of Reference 1. No relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

- None.

7 Potential Draft Safety Evaluation Impacts

- None.

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure:

1. Combined Operating License (COL) numbers NPF-93 and NPF-94

2. Virgil C. Summer Nuclear Station Units 2 & 3 Overall Integrated Plan with Regard to Mitigation Strategies for Beyond Design Basis External Events pursuant to license condition 2.D(13) "Mitigation Strategies for Beyond Design Basis External Events" of Combined License (COL) Numbers NPF-93 and NPF-94 Dated August 21, 2013 (Accession Number ML13234A519)