



April Rice
Manager
Nuclear Licensing

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NND-15-0306
10 CFR 50.90
10 CFR 52.63

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

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: LAR 14-09 License Amendment Request: Turbine Building Switchgear Rooms
and Office Area Layout Changes Supplement 1

- Reference:
1. Southern Nuclear Operating Company, ND-14-0878, Vogtle Electric Generating Plant Units 3 and 4 LAR-14-005 R0 License Amendment Request: Turbine Building Switchgear Rooms and Office Area Layout Changes
 2. NRC Issuance of License Amendment No. 17 (LAR 13-12) For Summer Units 2 and 3 (ML14218A687)
 3. South Carolina Electric & Gas Company (SCE&G) Request for License Amendment and Exemption LAR 14-09: Turbine Building Switchgear Rooms and Office Area Layout Changes (NND-14-0409) (ML14261A360)
 4. Southern Nuclear Operating Company, ND-14-1894, Vogtle Electric Generating Plant Units 3 and 4 LAR-14-005S License Amendment Request: Turbine Building Switchgear Rooms and Office Area Layout Changes (ML14346A260)

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 combined licenses (COLs) numbers NPF-93 and NPF-94, respectively.

By letter dated September 18, 2014, SCE&G submitted LAR 14-09 (Reference 3). The requested amendment would depart from VCSNS Units 2 and 3 plant-specific Design Control Document (DCD) Tier 2* material contained within the Updated Final Safety Analysis Report (UFSAR) by relocating fire area rated fire barriers due to changes to the layout of the switchgear rooms and office area in the turbine building. The requested amendment would also depart from plant-specific DCD Tier 2 material that involves the proposed Tier 2* departures.

This supplement to LAR 14-09 addresses comments provided by the NRC Staff in a Public Meeting on November 6, 2014 to Southern Nuclear Operating Company (SNC), regarding the depiction of the marked up changes on the UFSAR general arrangement drawings and the corresponding text in the LAR. The responses to these comments were provided at the November 6, 2014 public meeting by SNC, and are reiterated in SNC's letter, LAR-14-005 Enclosure 4 (Reference 4). The content of this letter's Enclosure 4 is consistent with SNC's LAR-14-005 Enclosure 4.

The information provided in this supplement does not change the scope of, nor affect the Technical Evaluation or the conclusion of the Significant Hazards Consideration determination in the original license amendment request (LAR 14-09) submitted on September 18, 2014.

In order to support the VCSNS Unit 2 construction schedule, SCE&G requests NRC staff review and approval of the license amendment by August 28, 2015. Approval by this date will allow sufficient time to implement the licensing basis changes prior to affected construction activities. SCE&G expects to implement the proposed amendment within 30 days of approval.

This letter contains no regulatory commitments.

In accordance with 10 CFR 50.91, SCE&G is notifying the State of South Carolina of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact Mr. Justin R. Bouknight 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 28th day of May, 2015.

Sincerely,



April Rice
Manager
Nuclear Licensing

MMD/RAJ/mmd

Enclosure 1-3: Previously submitted with the original LAR 14-09, in SCE&G letter NND-14-0409 (Reference 3)

Enclosure 4 : Virgil C. Summer Nuclear Station Units 2 and 3 – Response to NRC Comments provided at the November 6, 2014 Public Meeting (LAR 14-09 S1)

copy (with enclosures):

Denise McGovern
Chandu Patel
Ruth Reyes
DCRM-EDMS@SCANA.COM

copy (without enclosures):

Timothy Chandler
Nicholas Karlovich
Jose Vasquez
Patrick Donnelly
Thomas R. Fredette
Victor McCree
Jim Reece
Stephen A. Byrne
Jeffrey B. Archie
Ronald A. Jones
Alvis J. Bynum
Kathryn M. Sutton
April R. Rice
Justin R. Bouknight
Bryan Barwick
Dean Kersey
Matthew Presson
Matthew Kunkle
Mohamed Mory Diané
Margaret Felkel
Cynthia Lanier
Kristin Seibert
Neil Haggerty
Wes Sparkman
Pat Young
Michael Frankle
Sean Burk
Joel Hjelseth
Brian Bedford
Brian McIntyre
Joseph Cole
Zach Harper
Jim Mermigos
Chuck Baucom
Lisa Alberghini
Curt Castell
Ken Hollenbach
Susan E. Jenkins
William M. Cherry
Rhonda O'Banion
VCSummer2&3ProjectMail@cbi.com
VCSummer2&3Project@westinghouse.com

**South Carolina Electric and Gas Company
Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3**

NND 15-0306

Enclosure 4

**Response to NRC Comments provided
at the November 6, 2014 Public Meeting
(LAR 14-09 S1)**

With this supplement, South Carolina Electric & Gas Company (SCE&G) is providing a response to NRC comments received by Southern Nuclear Operating Company (SNC) in a Public Meeting on November 6, 2014, regarding the depiction of the marked up changes on the UFSAR general arrangement drawings and the corresponding text in the LAR. The responses below are consistent with the responses presented in LAR-14-005 Enclosure 4 (Reference 4), but have been adjusted in green to better match submitted LAR 14-09 (Reference 3).

NRC Comment #1:

In enclosure 3, page 4 of 5, there are two rectangular areas just outside of the doors leading out of room 20502 and 20501. Can [the Licensee] advise what these rectangular areas represent?

Licensee response to NRC Comment #1:

The two rectangular areas shown just outside the doors leading out of rooms 20502 and 20501 in Enclosure 3, page 4 of 5 [i.e., the marked up version of UFSAR Figure 9A-2 (Sheet 3 of 5)] are also shown in Enclosure 3, page 2 of 5 [i.e., the marked up version of UFSAR Figure 1.2-25]. Therefore, the Licensee's response to this question is applicable to both figures. These figures contain Security-Related Information and, accordingly, are requested to be withheld from public disclosure.

These rectangular areas denote egress pathways (i.e., walkways) that were carried over from the more detailed General Arrangement (GA) drawing from which UFSAR Figures 1.2-25 and 9A-2 (Sheet 3 of 5) were derived. These areas have no regulatory significance, as they do not represent regulatory-driven features, such as the locations of structures, equipment, or fire area/zone boundaries. As such, these rectangular areas may be treated as background information on these figures.

NRC Comment #2:

In Enclosure 1, page 4 of 15, **second to last sentence in the second to last paragraph** on the page: "Reorientation of the MV and LV switchgear will also necessitate moving the fire-rated walls along the north, east, and west exterior walls outward so that their interior face will be flush with the major vertical columns to allow installation of the vertical cable trays inside the west wall and still maintain adequate working space per NEC Article 110." If [the Licensee is] speaking of the Turbine Building, the East wall is not an exterior wall.

Licensee response to NRC Comment #2:

The Licensee agrees with the Staff's observation that the East wall is not an exterior wall, and accordingly provides the following alternative text to more accurately describe the switchgear room walls that are proposed to be relocated by this license amendment request. This revised wording does not change the scope, evaluations, or determinations provided in the original **LAR 14-09**.

The **second to last sentence in the second to last paragraph** in Enclosure 1, page 4 of 15, is revised from:

"Reorientation of the MV and LV switchgear will also necessitate moving the fire-rated walls along the north, east, and west exterior walls outward so that their interior face will be flush with the major vertical columns to allow installation of the vertical cable trays inside the west wall and still maintain adequate working space per NEC Article 110."

To read:

"Reorientation of the MV and LV switchgear will also necessitate moving the fire-rated north wall (along column line 20), west wall (along column line R) and east wall (near column line P.1) outward so that their interior faces are flush with the major vertical columns to allow installation of the vertical cable trays inside the west wall and still maintain adequate working space per NEC Article 110."