

July 30, 2015

Ms. April R. Rice, Manager
Nuclear Licensing
South Carolina Electric & Gas Company
14368 State Highway 213
Jenkinsville, SC 29065

Mr. J. A. Gresham, Manager
Regulatory Compliance
Westinghouse Electric Company
1000 Westinghouse Drive, Suite 428
Cranberry Township, PA 16066

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
FOR VIRGIL C. SUMMER NUCLEAR STATION UNITS 2 AND 3 LICENSE
AMENDMENT REQUEST 15-01, "HUMAN FACTORS VERIFICATION AND
VALIDATION PLAN UPDATES TO SUPPORT INTEGRATED SYSTEM
VALIDATION (TAC NO. RQ0440)

Dear Ms. Rice and Mr. Gresham:

By letter dated February 10, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15041A698), as supplemented by letter dated March 24, 2015 (ADAMS Accession No. ML15083A206), the South Carolina Electric & Gas Company (SCE&G/licensee) submitted an affidavit dated February 6, 2015 (and corrected March 13, 2015), which requested that the information contained in Enclosures 3P, 4P, and 5P of SCE&G's Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, License Amendment Request (LAR) 15-01 be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390. The titles of the documents in Enclosures 3P, 4P, and 5P are as follows:

APP-OCS-GEH-120, "AP1000 Human Factors Engineering Design Verification Plan,"
Revision 3

APP-OCS-GEH-220, "AP1000 Human Factors Engineering Task Support Verification
Plan," Revision 4

APP-OCS-GEH-320, "AP1000 Human Factors Engineering Integrated System Validation
Plan," Revision 6

A nonproprietary copy of each of the documents has been supplied by the applicant and placed in the Nuclear Regulatory Commission's (NRC) Public Document Room and added to the NRC Library in ADAMS. Those non-proprietary versions are included with the February 10, 2015, application.

The affidavit stated that the information submitted in Enclosures 3P, 4P, and 5P should be withheld from public disclosure for the following reasons:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouse's competitors without license from Westinghouse constitutes a competitive advantage over other companies.

- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

We have reviewed your application and the material which was requested to be withheld from public disclosure in accordance with the requirements of 10 CFR 2.390, and on the basis of the statements in the affidavit and the staff review, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure. Therefore, the version(s) of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-5848.

Sincerely,

/RA/

William (Billy) Gleaves, Senior Project Manager
Licensing Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos.: 52-027
52-028

cc: see next page

- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

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(Revised 06/16/2015)

cc:

Document Control and Records Management
P.O. Box 88
Mail Code 846
Jenkinsville, SC 29065

Mr. Jeffrey B. Archie
Sr. Vice President, Nuclear Operations
South Carolina Electric & Gas Company
MC D304
220 Operation Way
Cayce, SC 29033-3172

Gregrey Ginyard
366 Lakeview Drive
Jenkinsville, SC 29065

Ms. Gidget Stanley-Banks
Director
Allendale County EPA
426 Mullberry Street
Allendale, SC 29810

COL SCE&G – VC Summer Mailing List

Email

abynum@scana.com (Al Bynum)
amonroe@scana.com (Amy Monroe)
andy.barbee@scana.com (Andy Barbee)
April.Rice@scana.com (April Rice)
arice@scana.com (April R. Rice)
awc@nei.org (Anne W. Cottingham)
bedforbj@westinghouse.com (Brian Bedford)
Bill.Jacobs@gdsassociates.com (Bill Jacobs)
bill.wood@cbi.com (Bill Wood)
charles.baucom@cbi.com (Charles T. Baucom)
christina.barnett@scana.com (Christina Barnett)
collinlj@westinghouse.com (Leslie Collins)
CumminWE@Westinghouse.com (Edward W. Cummins)
curtis.castell@cbi.com (Curtis Castell)
cwaltman@roe.com (C. Waltman)
david.jantosik@cbi.com (David Jantosik)
david.lewis@pillsburylaw.com (David Lewis)
DCRM-EDMS@SCANA.COM
delongra@westinghouse.com (Rich DeLong)
dgriffin@scana.com (Donna S. Griffin)
ed.burns@earthlink.net (Ed Burns)
ewingja@westinghouse.com (Jerrod Ewing)
fbelser@regstaff.sc.gov
gary@jonespartners.net (Gary Jones)
George_Stramback@Charter.net (George Stramback)
gsoult@regstaff.sc.gov (Gene G. Soult)
james.comer@cbi.com (James Comer)
jarchie@scana.com (Jeffrey B. Archie)
jeff.lyash@cbi.com (Jeff Lyash)
jenkinse@dhec.sc.gov (Susan Jenkins)
jflitter@regstaff.sc.gov
john.simmons@cbi.com (John A. Simmons)
Joseph_Hegner@dom.com (Joseph Hegner)
justin.bouknight@scana.com (Justin R. Bouknight)
karlg@att.net (Karl Gross)
kelly.trice@cbi-psg.com (Kelly Price)
ken.hollenbach@cbi.com (Kenneth W. Hollenbach)
kinneyrw@dhec.sc.gov (Ronald Kinney)
kroberts@southernco.com (Kelli Roberts)
KSutton@morganlewis.com (Kathryn M. Sutton)
kwaugh@impact-net.org (Kenneth O. Waugh)
lchandler@morganlewis.com (Lawrence J. Chandler)
majames@regstaff.sc.gov (Anthony James)
maria.webb@pillsburylaw.com (Maria Webb)

COL SCE&G – VC Summer Mailing List

mcintyba@westinghouse.com (Brian McIntyre)
media@nei.org (Scott Peterson)
michael.annacone@cbi.com (Michael Annacone)
MSF@nei.org (Marvin Fertel)
nicholle.burroughs@cbi.com (Nicholle Burroughs)
nirsnet@nirs.org (Michael Mariotte)
Nuclaw@mindspring.com (Robert Temple)
patriciaL.campbell@ge.com (Patricia L. Campbell)
paul.mothena@scana.com (Paul Mothena)
Paul@beyondnuclear.org (Paul Gunter)
pbessette@morganlewis.com (Paul Bessette)
porterhj@dhec.sc.gov (Henry Porter)
r.joshi15@comcast.net (Ravi Joshi)
randall@nexusamllc.com (Randall Li)
RJB@NEI.org (Russell Bell)
Ronald.Jones@scana.com (Ronald Jones)
russpa@westinghouse.com (Paul Russ)
rwink@ameren.com (Roger Wink)
sabinski@suddenlink.net (Steve A. Bennett)
sburdick@morganlewis.com (Stephen Burdick)
sbyrne@scana.com (Stephen A. Byrne)
sfrantz@morganlewis.com (Stephen P. Frantz)
shudson@regstaff.sc.gov (Shannon Hudson)
solleyda@dhec.sc.gov (David Solley)
stephan.moen@ge.com (Stephan Moen)
TGATLIN@scana.com (Thomas Gatlin)
threatsj@dhec.sc.gov (Sandra Threatt)
tom.miller@hq.doe.gov (Tom Miller)
TomClements329@cs.com (Tom Clements)
Vanessa.quinn@dhs.gov (Vanessa Quinn)
vcsnrc@scana.com (NRC Senior Resident Inspector
virgil.barton@cbi.com (Virgil Barton)
Wanda.K.Marshall@dom.com (Wanda K. Marshall)
weave1dw@westinghouse.com (Doug Weaver)
William.Cherry@scana.com (William Cherry)
wmcherry@santeecooper.com (Marion Cherry)