

August 13, 2015

Mr. Ronald A. Jones, Vice President
New Nuclear Operations
South Carolina Electric & Gas Company
14368 State Highway 213
Jenkinsville, SC 29065

SUBJECT: ACCEPTANCE REVIEW OF SOUTH CAROLINA ELECTRIC & GAS
COMPANY'S REQUEST FOR LICENSE AMENDMENT (LAR 14-10) AND
EXEMPTION FOR THE VIRGIL C. SUMMER NUCLEAR STATION UNITS 2
AND 3: ADDITION OF INSTRUMENTS TO DESIGN RELIABILITY ASSURANCE
PROGRAM (TAC NO. RQ0455)

Dear Mr. Jones:

By letter dated July 6, 2015 (Agencywide Documents Access and Management System Accession No. ML15188A275), South Carolina Electric & Gas Company (SCE&G) submitted a license amendment request and an exemption for the Virgil C. Summer Nuclear Station (VCSNS), Units 2 and 3 (Combined License (COL) Nos. NPF-93 and NPF-94). SCE&G proposes to modify the feedwater controller program so that it will respond as required to various plant transients while minimizing the potential for undesired actuation. SCE&G has determined that this modification requires departures and exemptions from the plant-specific design control document.

Accordingly, SCE&G proposes changes to the Updated Final Safety Analysis Report (UFSAR) in the form of departures from the Tier 2 information incorporated in the plant-specific design control document, as well as changes to related plant-specific Tier 1 information with corresponding changes to the associated information in the COL (Appendix C, "Inspections, Tests, Analyses, and Acceptance Criteria"). These changes to Tier 1 information entail a request for exemption in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, "Design Certification Rule for the AP1000 Design." SCE&G determined that the requested departures and exemption were necessary to allow changes to the scope of the design reliability assurance program (D-RAP).

The proposed changes involve two tables:

- Tier 1 Table 3.7-1, "Design Reliability Assurance Program," which is the list of components that are subject to Inspections, Tests, Analyses, and Acceptance Criteria 3.7.00.01 (D-RAP ITAAC)
- Tier 2 Table 17.4-1, "Risk-Significant [Structures, Systems, and Components] SSCs Within the Scope of D-RAP"

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of these requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical reviews. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with 10 CFR Section 50.90, an application for an amendment to the license must fully describe the changes requested, and follow as far as applicable, the form prescribed for original applications. 10 CFR Section 52.79 addresses content of technical information that is required for COL application FSARs. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical reviews and make an independent assessment regarding the acceptability of the proposed amendment and exemption in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

If you have any questions, please contact me at (301) 415-3249 or Ruth.Reyes@nrc.gov.

Sincerely,

/RA/

Ruth C. Reyes, Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket No(s): 52-027
52-028

cc: See next page

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