



April R. Rice
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August 20, 2015
NND-15-0486

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
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Virgil C. Summer Nuclear Station (VCSNS) Units 2 & 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 20th day of August, 2015.

Sincerely,



April R. Rice
Manager, Nuclear Licensing
New Nuclear Deployment

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

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Enclosure 1

Six (6) Month Status Report Regarding Implementation

of the

Overall Integrated Plan for Mitigation Strategies

for Beyond Design Basis External Events

Six Month Status Report Regarding Implementation of the Overall Integrated Plan

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 periodic 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 20, 2015:

- 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	N/A
Submit 6 Month Status Report	Feb. 2015	Complete	N/A
Submit 6 Month Status Report	Aug. 2015	Complete	N/A
Submit 6 Month Status Report	Feb. 2016	Not Started	
Ensure Operational Procedures include necessary information	Jun. 2016	Not Started	
Develop Response Plan with NSRC	Jun. 2016	Not Started	
Initiate Phase 3 Equipment Procurement	Jun. 2016	Not Started	
Submit 6 Month Status Report	Aug. 2016	Not Started	
Submit 6 Month Status Report	Feb. 2017	Not Started	
Staffing Analysis Completed	Aug. 2017	Not Started	
Submit 6 Month Status Report	Aug. 2017	Not Started	
NSRC Operational for V.C. Summer 2&3	Jan. 2017	Not Started	Jan. 2018
Submit 6 Month Status Report	Feb. 2018	Not Started	
Training completed for the Phase 3 FLEX strategies	Mar. 2018	Not Started	
Demonstration for Unit 2	Apr. 2017	Not Started	Apr. 2018

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Enclosure 1

Six Month Status Report Regarding Implementation of the Overall Integrated Plan

Submit Completion Report for Unit 2	Jul. 2017	Not Started	Jul. 2018
Submit 6 Month Status Report		Not Started	Aug. 2018
Submit 6 Month Status Report		Not Started	Feb. 2019
Demonstration for Unit 3	Apr. 2018	Not Started	Apr. 2019
Submit Completion Report for Unit 3	Jul. 2018	Not Started	Jul. 2019

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)