



**April Rice**  
Manager  
New Nuclear Licensing

March 24, 2016  
NND-16-0105  
10 CFR 50.90  
10 CFR 52.63

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

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

**Subject:** Supplement to Request for License Amendment and Exemption: Addition of Instruments to Design Reliability Assurance Program (D-RAP) (LAR 14-10S)

- References:**
1. Request for License Amendment and Exemption: Addition of Instruments to Design Reliability Assurance Program (D-RAP) (LAR 14-10) (NND-15-0383) (ML15188A275)
  2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4, Request for License Amendment and Exemption: Addition of Instruments to Design Reliability Assurance Program (D-RAP) (LAR-14-006) (ND-14-0892) (ML14280A391)
  3. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4, Supplement to Request for License Amendment: Addition of Instruments to Design Reliability Assurance Program (D-RAP) (LAR-14-006S) (ML15247A515)

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G), the licensee for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, requested an amendment to Combined License (COL) Numbers NPF-93 and NPF-94 for VCSNS Units 2 and 3, respectively, by SCE&G letter NND-15-0383, dated July 6, 2015 (Reference 1). The SCE&G license amendment request, LAR 14-10, proposed to depart from the incorporated plant-specific Design Control Document (PS-DCD) Tier 2 information, and involved changes to related plant-specific Tier 1 information, with corresponding changes to the associated COL Appendix C information. These changes were needed to allow the feedwater controller program to respond as required to various plant transients while minimizing the potential for undesired actuations. The amendment request was identical to Southern Nuclear Company's (SNC) amendment request LAR-14-006, dated October 7, 2014 (Reference 2).

Upon review of Reference 2, the Nuclear Regulatory Commission staff requested the Licensee to identify and address any impact on performance requirements and functional capability provisions (including fluid transient loads and vibration) for pumps, valves and dynamic restraints for both the MFW system and SFW system due to the proposed change. SNC responded by submitting Reference 3, dated September 4, 2015. The NRC's question to SNC is

within the scope of Reference 1; therefore SCE&G elects to submit a voluntary response identical to the one provided by SNC in Reference 3.

The changes proposed by SCE&G LAR 14-10 do not impact performance requirements or functional capability provisions for equipment or dynamic restraints in the AP1000 main and startup feedwater system (FWS). The proposed change will simply utilize different control logic and instrumentation to actuate startup feedwater pumps for their defense-in-depth function of maintaining steam generator water level when main feedwater pumps are unavailable. The functionality that exists as part of the current design remains unchanged by the changes proposed by LAR 14-10, and therefore LAR 14-10 has no impact on the ability of the AP1000 plant to cool down under emergency shutdown conditions or during a loss of offsite power event.

This response does not change the scope, or affect the Technical Evaluation or the conclusions of the Significant Hazards Consideration determination in the original license amendment request (LAR 14-10) submitted on July 6, 2015. 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 Justin Bouknight by telephone at (803) 941-9828, or by email at [justin.bouknight@scana.com](mailto:justin.bouknight@scana.com).

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

Executed on this 24<sup>th</sup> day of March, 2016.

Sincerely,



April Rice  
Manager  
New Nuclear Licensing

BB/ARR/bb

c: Billy Gleaves  
Ruth Reyes  
Chandu Patel  
Paul Kallan  
Tom Fredette  
Tomy Nazario  
Cathy Haney  
Jim Reece  
Stephen A. Byrne  
Jeffrey B. Archie  
Ronald A. Jones  
Alvis J. Bynum  
Kathryn M. Sutton  
April Rice  
Justin Bouknight  
Matt Kunkle  
Mory Diane  
Bryan Barwick  
Dean Kersey  
Margaret Felkel  
Cynthia Lanier  
Kristin Seibert  
Amanda Pugh  
Neil Haggerty  
Pat Young  
Zach Harper  
Brian McIntyre  
Brian Bedford  
Carl Churchman  
Joseph Cole  
Chuck Baucom  
Lisa Alberghini  
Curt Castell  
Jeff Hawkins  
Susan E. Jenkins  
William M. Cherry  
Rhonda O'Banion  
vcsummer2&3project@westinghouse.com  
VCSUMMER2&3ProjectMail@cbi.com  
DCRM-EDMS@SCANA.COM