



April R. Rice
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April 21, 2016
NND-16-0141
10 CFR 50.90
10 CFR 52.63

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
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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 14-15 S2: VCSNS Units 2 and 3 Confirmation of Main Generator
Circuit Breaker Audit Report Applicability Related to Request for License
Amendment and Exemption: Compressed and Instrument Air System
High Pressure Air Subsystem Changes

In accordance with 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G), acting on behalf of itself and South Carolina Public Service Authority (Santee Cooper), the licensees 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 letters NND-14-0531 dated October 30, 2014 [Accession No. ML14303A635] and NND-15-0101 dated July 13, 2015 [Accession No. ML15194A314]. The proposed license amendment request (LAR) would depart from VCSNS Units 2 and 3 COLs Appendix C and from plant-specific Design Control Document (DCD) Tier 1 material and Tier 2 material contained in the Updated Final Safety Analysis Report (UFSAR) to reconcile text and figure differences related to the removal of a supply line from the Compressed and Instrument Air System (CAS) to the main generator breaker package. As noted in the October 30, 2014 and July 13, 2015 SCE&G letters, the changes proposed in the license amendment request (LAR 14-15) are identical in technical content with the Southern Nuclear Operating Company (SNC) LAR-14-009 submittals on this topic [Accession Numbers ML14227A707 and ML15016A416].

To support their review of the SNC LAR-14-009 submittals, the Nuclear Regulatory Commission (NRC) performed an audit in June 2015 of various circuit breaker related documents provided by SNC. As a result, the NRC issued Audit Report for the Methodology of Calculations Supporting the Design of the Main Generator Circuit Breaker of Vogtle Electrical Generating Plant Units 3 and 4 (TAC No. RP9498) dated September 8, 2015 [Accession Number ML15246A370]. In the audit report, the NRC

concluded that the methodology of the calculations and design tests for the Vogtle Main Generator Circuit Breaker conformed to the recommendations of IEEE Std. C37.013 and the Standard Review Plan Section 8.2.

SCE&G reviewed the September 8, 2015 Vogtle audit report and consulted with cognizant V.C. Summer engineering subject matter experts. SCE&G had representation present during the audit and has continued to follow the NRC review. There are no differences between the Vogtle and V.C. Summer projects for this LAR. As a result, SCE&G is submitting this letter to confirm that the methods and calculations used for the Vogtle project prepared by Westinghouse and audited by the NRC (APP-ZAS-E0C-003, Revision 3, "Generator Circuit Breaker and Isolated Phase Bus (IPB) Duct Continuous and Short Circuit Current Ratings" and APP-ES03-Z0-001, Revision 1, "Design Specification" for the Main GCB) are identical to those used to support V.C. Summer Nuclear Station Units 2 and 3 LAR 14-15.

The information provided in this letter does not change the scope of, nor affect the Technical Evaluation or the conclusions of the Significant Hazards Consideration determination in LAR 14-15 submitted on October 30, 2014 and LAR 14-15 S1 submitted on July 13, 2015. This letter contains no regulatory commitments.

SCE&G requests staff approval of the license amendment and exemption by June 21, 2016. SCE&G expects to implement the proposed amendment within 30 days of the approval of the requested changes.

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

Should you have any questions, please contact Mr. Justin 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 21st day of April, 2016.

Sincerely,



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ARR/gt

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