



September 28, 2016  
NND-16-0410  
10 CFR 50.90

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3  
Combined License Nos. NPF-93  
Docket No. 52-027

Subject: Supplement to Preliminary Amendment Request (PAR): Structural  
Design of Auxiliary Building Floors (PAR 14-14 S)

By letter NND-16-0214, dated July 7, 2016, South Carolina Electric & Gas Company (SCE&G) submitted a Preliminary Amendment Request (PAR), PAR 14-14 [ML16189A445], to minimize construction delays for Virgil C. Summer Nuclear Station (VCSNS) Unit 2 during the NRC's evaluation of the related License Amendment Request (LAR) 14-14 R1. PAR 14-14 specifically requested a "no objection" to proceeding with construction of the floor structures of the CA20 Piping/Valve Room (Room number 12262) at design elevation 82'-6" and the following rooms inside CA20 located at or near design elevation 92'-6": Pipe Chase (Room number 12269), Cask Loading Pit (Room number 12463), Spent Fuel Storage Pit (Room number 12563), and Waste Monitor Tank Room B (Room number 12365). As required by License Condition 2.D.(1), the NRC Staff received the associated LAR 14-14 R1 referenced by PAR 14-14. The Staff then evaluated the license amendment documentation supporting LAR 14-14 R1 and determined that there was sufficient information to accept LAR 14-14 R1 for detailed technical review. This PAR was subsequently accepted with a "no objection" letter issued by the NRC Staff on July 21, 2016 [ML16197A566].

Subsequently, by letter NND-16-0332, dated August 16, 2016, SCE&G submitted a revised LAR, LAR 14-14 R2 [ML16230A179], to amend the VCSNS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) to revise details related to the structural design of auxiliary building floors. This Revision 2 of LAR 14-14 reinstated the full scope of impacted structures, systems, and components (SSCs) discussed in the initial submittal of the LAR under SCE&G letter NND-16-0204 [ML16168A282]. This scope had been narrowed by Revision 1 of LAR 14-14 in SCE&G letter NND-16-0242 [ML16189A453].

The NND-16-0332 cover letter for LAR 14-14 R2 states in part, "Having completed the remaining necessary, supporting calculations, this revision re-instates [emphasis added] the original scope of the request." In the subsequent paragraph, the letter continues,

“Enclosures 3 and 4 of the revised request in Reference 2 [NND-16-0242] are replaced [emphasis added] in their entirety with Enclosures 5 and 6 of this second revised request.”

Because SCE&G is concerned that this wording may not have accurately reflected the intent of the Licensee, SCE&G is providing a clarification below.

The use of “re-instates” in LAR 14-14 R2 is meant to convey information regarding the scope of the SSCs impacted by that revision of the proposed LAR, i.e., elevations 100'-0" to 135'-3" in CA20 and auxiliary building finned floors at elevations 117'-6" and 135'-3". Such scope was included in LAR 14-14, prior to the reduction of the SSCs scope with LAR 14-14 R1. LAR 14-14 R1 has not been withdrawn by SCE&G and still remains on the VCSNS docket.

Enclosures 5 and 6 of LAR 14-14 R2 envelope the scope of changes to the SSCs found in LAR 14-14 R1. The technical information provided in LAR 14-14 R1 (that is the basis for the PAR “no objection” finding) is also included as part of LAR 14-14 R2. The activities conducted under the PAR finding of “no objection” are fully supported by the technical information in LAR 14-14 R2. SCE&G's intent is that Enclosures 3 and 4 remain fully in effect until such time that LAR 14-14 R2 is accepted for technical review in accordance with 10 CFR 50.90 and 10 CFR 52.79. If LAR 14-14 R2 is accepted for technical review, Enclosures 5 and 6 will subsume Enclosures 3 and 4 for the purposes of the NRC technical review of the LAR.

Since LAR 14-14 R1 remains on the docket, and LAR 14-14 R2 envelopes the scope of changes to the SSCs found in LAR 14-14 R1, the basis for the no objection letter for PAR 14-14 remains in effect and therefore SCE&G continues to rely upon the “no objection” notice granted for the scope of the SSCs described by PAR 14-14. This scope is supported by both LAR 14-14 R1 and LAR 14-14 R2.

Should you have any questions, please contact Mr. Nick Kellenberger by telephone at (803) 941-9834, or by email at [nicholas.r.kellenberger@scana.com](mailto:nicholas.r.kellenberger@scana.com).

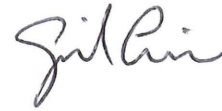
This letter contains no regulatory commitments.

Document Control Desk  
NND-16-0410  
Page 3 of 4

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

Executed on this 28<sup>th</sup> day of September, 2016.

Sincerely,

A handwritten signature in cursive script, appearing to read "April R. Rice".

April R. Rice  
Manager  
New Nuclear Licensing

MHK/ARR/mhk

Copy:

Jennifer Dixon-Herrity  
Sam Lee  
Billy Gleaves  
Ruth Reyes  
Chandu Patel  
Paul Kallan  
Tom Fredette  
Tomy Nazario  
Jennifer Uhle  
Cathy Haney  
Jim Reece  
Stephen A. Byrne  
Jeffrey B. Archie  
Ronald A. Jones  
Alvis J. Bynum  
Kathryn M. Sutton  
April Rice  
Nick Kellenberger  
Matt Kunkle  
Mory Diane  
Bryan Barwick  
Dean Kersey  
Neil Haggerty  
Cynthia Lanier  
Lisa Spears  
Frederick Willis  
Carl Churchman  
Ken Langdon  
Pat Young  
Zach Harper  
Brian McIntyre  
Brian Bedford  
Joseph Cole  
Chuck Baucom  
Lisa Alberghini  
Curt Castell  
Jeff Hawkins  
Susan E. Jenkins  
William M. Cherry  
Rhonda O'Banion  
DCRM-EDMS@SCANA.COM  
vcsummer2&3project@westinghouse.com  
VCSummerMail@westinghouse.com