

SAFETY EVALUATION BY THE OFFICE OF NEW REACTORS

RELATED TO AMENDMENT NO. 62

TO THE COMBINED LICENSE NOS. NPF-93 AND NPF-94

SOUTH CAROLINA ELECTRIC & GAS COMPANY

SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

VIRGIL C. SUMMER NUCLEAR STATION UNITS 2 AND 3

DOCKET NOS. 52-027 AND 52-028

1.0 INTRODUCTION

By letter dated October 21, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15295A090), the South Carolina Electric & Gas Company, on behalf of itself and the South Carolina Public Service Authority (SCE&G or licensee) requested that the U.S. Nuclear Regulatory Commission (NRC or Commission) amend the combined licenses (COL) for the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3. By letter dated December 23, 2015 (ADAMS Accession No. ML15338A067), the NRC provided SCEG with the results of the staff's acceptance review of license amendment request (LAR) 13-31, which concluded that the LAR was sufficient for the staff to perform the detailed technical review. In letters dated March 31 and July 14, 2016 (ADAMS Accession Nos. ML16091A380 and ML16196A354), the licensee submitted additional information that supplemented the LAR. The NRC staff's proposed no significant hazards consideration determination was published in the *Federal Register* on January 19, 2016 (81 FR 2915). The March 31 and July 14, 2016, supplements did not provide any information that would change the conclusions in the proposed no significant hazards consideration determination.

The LAR proposes to modify the design of the low capacity Central Chilled Water Subsystem (VWS) by relocating Air Cooled Chiller Pump 3 and its associated equipment, including a new chemical feed tank, from the Auxiliary Building to the Annex Building. The LAR consists of changes to the Updated Final Safety Analysis Report (UFSAR) in the form of departures from the incorporated plant-specific Design Control Document (DCD) Tier 2 and Tier 2\* information and changes to Tier 1 information, with corresponding changes to the associated COL Appendix C information. The licensee has also requested an exemption from the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, "Design Certification Rule for the AP1000 Design," Section III.B, "Scope and Contents," to allow a departure from Tier 1 of the generic DCD.<sup>1</sup>

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<sup>1</sup> While the licensee describes the requested exemption as being from Section III.B of 10 CFR Part 52, Appendix D, the entirety of the exemption pertains to proposed changes to Tier 1 information in the generic DCD. In the remainder of this evaluation, the NRC will refer to the exemption as an exemption from Tier 1 information to match the language of Section VIII.A.4 of 10 CFR Part 52, Appendix D, which specifically governs the granting of exemptions from Tier 1 information.

To modify plant-specific Tier 1 information, the NRC must find the licensee's exemption request included in its submittal for the LAR acceptable. The staff's review of the exemption request as well as the LAR is included in this safety evaluation.

## 2.0 REGULATORY EVALUATION

As defined in Section II of Appendix D to 10 CFR Part 52, Tier 1 information includes Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and design descriptions, among other things. Therefore, a licensee referencing Appendix D incorporates by reference all Tier 1 information contained in the generic DCD. The Tier 1 ITAAC and the design descriptions, along with the plant-specific ITAAC, were included in Appendix C of the COL at its issuance.

Appendix D, Section III.B requires a licensee referencing 10 CFR Part 52, Appendix D to incorporate by reference and comply with the requirements of Appendix D, including all Tier 1 information contained in the generic AP1000 DCD.

Appendix D, Section VIII.A.4 to 10 CFR Part 52 states that exemptions from Tier 1 information are governed by the requirements in 10 CFR 52.63(b)(1) and 10 CFR 52.98(f). It also states that the Commission will deny such a request if it finds that the design change will result in a significant decrease in the level of safety otherwise provided by the design.

Appendix D, Section VIII.B.5.a to 10 CFR Part 52 states that an applicant or licensee who references 10 CFR Part 52, Appendix D may depart from Tier 2 information, without prior NRC approval, unless the proposed departure involves a change to or departure from Tier 1 information, Tier 2\* information, or Technical Specifications, or requires a license amendment under Paragraphs B.5.b or B.5.c of 10 CFR Part 52, Appendix D, Section VIII. LAR 13-31, as supplemented, involves changes to the UFSAR in the form of departures from the incorporated plant-specific DCD Tier 2 information and involves related changes to UFSAR Tier 2\* and COL Appendix C information, with corresponding changes to the associated plant-specific Tier 1 information, so NRC approval is required for Tier 2 changes where Tier 1 changes are associated.

10 CFR 52.63(b)(1) allows the licensee who references a design certification rule to request NRC approval for an exemption from one or more elements of the certification information. The Commission may only grant such a request if it determines that the exemption will comply with the requirements of 10 CFR 52.7, which, in turn, points to the requirements listed in 10 CFR 50.12 for specific exemptions. In addition, the Commission must consider whether special circumstances, as required by 10 CFR 52.7 and 50.12, outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption. Therefore, any exemption from the Tier 1 information certified by Appendix D to 10 CFR Part 52 must meet the requirements of 10 CFR 50.12, 52.7, and 52.63(b)(1).

10 CFR 52.98(c)(1) provides that changes to or departures from information within the scope of the referenced design certification rule are subject to the applicable change processes in that rule.

10 CFR 52.98(c)(2) provides that changes that are not within the scope of the referenced design certification rule are subject to the applicable change processes in 10 CFR Part 50, unless they also involve changes to or noncompliance with information within the scope of the referenced design certification rule. In these cases, the applicable provisions of this section and the design certification rule apply.

10 CFR 52.98(f) states that any modification to, addition to, or deletion from, the terms and conditions of a COL, including any modification to, addition to, or deletion from, the inspections, tests, analyses, or related acceptance criteria contained in the license is a proposed amendment to the license. Appendix C of COLs NPF-91 and NPF-92 contains information that the licensee is proposing to modify. Therefore, the proposed changes require a license amendment.

The specific NRC technical requirements applicable to LAR 13-31 are the general design criteria (GDC) in Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." In particular, these technical requirements include the following GDC:

GDC 2, "Design bases for protection against natural phenomena," requires that structures, systems, and components (SSCs) important to safety shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions.

GDC 4, "Environmental and Dynamic Effects Design Basis," requires that SSCs important to safety shall be designed to accommodate the effects of, and be compatible with the environmental conditions associated with, normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents. These SSCs shall be appropriately protected against dynamic effects, including the effects of missiles, pipe whipping, and discharging fluids, that may result from equipment failures and from events and conditions outside the nuclear power unit. However, dynamic effects associated with postulated pipe ruptures in nuclear power units may be excluded from the design basis when analyses reviewed and approved by the Commission demonstrate that the probability of fluid system piping rupture is extremely low under conditions consistent with the design basis for the piping.

### 3.0 TECHNICAL EVALUATION

#### 3.1 EVALUATION OF EXEMPTION

##### INTRODUCTION

As stated previously, the regulations in Section III.B of Appendix D to 10 CFR Part 52 require a holder of a COL referencing Appendix D to 10 CFR Part 52 to incorporate by reference and comply with the requirements of Appendix D, including certified information in Tier 1 of the generic AP1000 DCD. As defined in Section II of Appendix D to 10 CFR Part 52, Tier 1 information includes ITAAC and design descriptions, among other things. Therefore, a licensee referencing Appendix D incorporates by reference all Tier 1 information contained in the generic DCD. The Tier 1 ITAAC and the design descriptions, along with the plant-specific ITAAC, were included in Appendix C of the COL at its issuance. Because the licensee has identified changes to plant-specific Tier 1 information in LAR 13-31, the licensee requests a permanent exemption from the provisions of 10 CFR Part 52, Appendix D, Section III.B, to allow a departure from elements of the certification information in Tier 1 of the generic AP1000 DCD. Because the changes to plant-specific Tier 1 information and corresponding changes to the associated COL Appendix C information, as identified by the licensee, result in the need for a departure, an exemption from the certified design information is required. The Tier 1 (and COL Appendix C) information for which a plant-specific departure and exemption is being requested includes

changes to Tier 1 (and COL Appendix C) Table 2.7.2-3 to indicate that the Air Cooled Chiller Pump 3 is located in the Annex Building rather than the Auxiliary Building. The result of this request would be that the licensee could implement modifications to Tier 1 information described and justified in LAR 13-31 if, and only if, the NRC approves the LAR. This exemption is a permanent exemption limited in scope to the particular Tier 1 information specified.

As stated in Section VIII.A.4 of Appendix D to 10 CFR Part 52, an exemption from Tier 1 information is governed by the requirements of 10 CFR 52.63(b)(1) and 52.98(f). Additionally, Section VIII.A.4 of Appendix D to 10 CFR Part 52 provides that the Commission will deny a request for an exemption from Tier 1 if it finds that the requested change will result in a significant decrease in the level of safety otherwise provided by the design. Pursuant to 10 CFR 52.63(b)(1), the Commission may grant exemptions from one or more elements of the certification information, so long as the criteria given in 10 CFR 52.7 are met and that the special circumstances, as defined by 10 CFR 50.12(a)(2), outweigh any potential decrease in safety due to reduced standardization.

Pursuant to 10 CFR 52.7, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 52. As 10 CFR 52.7 further states, the Commission's consideration will be governed by 10 CFR 50.12, "Specific exemptions," which states that an exemption may be granted when: (1) the exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security; and (2) special circumstances are present. Specifically, 10 CFR 50.12(a)(2) lists six special circumstances for which an exemption may be considered. It is necessary for one of these special circumstances to be present in order for the NRC to consider granting an exemption request. The licensee stated that the requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subparagraph defines special circumstances as when "[a]pplication of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule." The staff's analysis of each of these findings is presented below.

### 3.1.1 AUTHORIZED BY LAW

This exemption would allow the licensee to implement approved changes to the COL Appendix C and corresponding plant-specific Tier 1. This is a permanent exemption limited in scope to particular plant-specific Tier 1 information, and subsequent changes to that, or any other Tier 1, information would be subject to full compliance by the licensee as specified in Section III.B of Appendix D to 10 CFR Part 52. As stated above, 10 CFR 52.63.b(1) allows the NRC to grant exemptions from one or more elements of the certification information, namely, the requirements of Section III.B of Appendix D to 10 CFR Part 52. The NRC staff has determined that granting of the licensee's proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, as required by 10 CFR 50.12(a)(1), the exemption is authorized by law.

### 3.1.2 NO UNDUE RISK TO PUBLIC HEALTH AND SAFETY

The underlying purpose of Appendix D to 10 CFR 52 is to ensure that a licensee will construct and operate the plant based on the approved information found in the DCD incorporated by reference into a licensee's licensing basis. The changes proposed by the licensee, the relocation of Air Cooled Chiller Pump 3 to the Annex Building, will not impact the ability of the components to perform their design functions. Because they will not alter the operation of any

plant equipment or systems, these changes do not present an undue risk from existing equipment or systems. The changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures. Accordingly, these changes do not present an undue risk from any new equipment or systems. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that there is no undue risk to public health and safety.

### 3.1.3 CONSISTENT WITH COMMON DEFENSE AND SECURITY

The proposed exemption would make changes to elements of the plant-specific DCD Tier 1 information to depart from the AP1000 certified design. The Tier 1 proposed changes includes changes to relocate Air Cooled Chiller Pump 3 to the Annex Building from the Auxiliary Building. Specifically, relocation of the air cooled chiller pump to Annex Building Room 40500 requires a change to plant-specific Tier 1 (and COL Appendix C) Table 2.7.2-3 to indicate that Air Cooled Chiller Pump 3, VWS-MP-03, is located in the Annex Building rather than the Auxiliary Building. Subsequent changes to Tier 1 information would be subject to full compliance by the licensee as specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52. The change does not alter or impede the design, function, or operation of any plant SSCs associated with the facility's physical or cyber security, and therefore does not affect any plant equipment that is necessary to maintain a safe and secure plant status. In addition, the change has no impact on plant security or safeguards procedures. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that the common defense and security is not impacted by this exemption.

### 3.1.4 SPECIAL CIRCUMSTANCES

Special circumstances, in accordance with 10 CFR 50.12(a)(2)(ii), are present whenever application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. The underlying purpose of the Tier 1 information is to ensure that a licensee will safely construct and operate a plant based on the certified information found in the AP1000 DCD, which was incorporated by reference into the licensee's licensing basis. The licensee proposes to relocate Air Cooled Chiller Pump 3 to the Annex Building and maintain the design functions of the VWS. These changes are necessary to enable the licensee to construct the plant based on the information in the certified design.

Special circumstances are present in the particular circumstances discussed in the LAR because the application of the specified Tier 1 information does not serve the underlying purpose of the rule. The proposed change implements changes to Tier 1 information. This exemption request and associated revisions to Tier 1 information demonstrate that the applicable regulatory requirements will continue to be met. Consequently, the safety impact that may result from any reduction in standardization is minimized because the proposed design change does not result in a reduction in the level of safety. Therefore, the staff finds that the special circumstances required by 10 CFR 50.12(a)(2)(ii) for the granting of an exemption from Section III.B of Appendix D to 10 CFR Part 52 exist.

### 3.1.5 SPECIAL CIRCUMSTANCES OUTWEIGH REDUCED STANDARDIZATION

This exemption would allow the implementation of changes to the VCSNS plant-specific Tier 1 information, as proposed in the LAR. The Tier 1 proposed changes includes changes to relocate Air Cooled Chiller Pump 3 to the Annex Building from the Auxiliary Building. Specifically, relocation of the air cooled chiller pump to Annex Building Room 40500 requires a change to plant-specific Tier 1 (and COL Appendix C) Table 2.7.2-3 to indicate that Air Cooled Chiller Pump 3, VWS-MP-03, is located in the Annex Building rather than the Auxiliary Building. The design functions of the system associated with this request will continue to be maintained because the associated revisions to VCSNS plant-specific Tier 1 demonstrate that the applicable regulatory requirements will continue to be met. So while the information in plant-specific Tier 1 may be changed, the changes have no effect on any SSCs meeting their design function. Consequently, the safety impact that may result from any reduction in standardization is minimized, because the proposed design change does not result in a reduction in the level of safety. In addition, the licensee stated that the evolution of the system design has resulted in an increase in the footprint of the VWS low capacity air cooled chiller pump module, such that the module is larger than the space provided in Room 12501. The proposed change enables the system to be built. Based on this, as required by 10 CFR Part 52.63(b)(1), the staff finds that the special circumstances outweigh the effects of reduced standardization that the departure has on the AP1000 design.

### 3.1.6 NO SIGNIFICANT REDUCTION IN SAFETY

This exemption would allow the implementation of changes to VCSNS plant-specific Tier 1 proposed in the LAR. The exemption request proposes to depart from the certified design by relocating Air-Cooled Chiller Pump 3 (Equipment Tag No. VWS-MP-03) and associated support equipment. The changes for consistency will not impact the functional capabilities of this system. The proposed changes will not adversely affect the ability of the VWS to perform its design functions, and the level of safety provided by the current systems and equipment therein is unchanged. Therefore, based on the foregoing reasons and as required by 10 CFR Part 52, Appendix D, Section VIII.A.4, the staff finds that granting the exemption would not result in a significant decrease in the level of safety otherwise provided by the design.

## 3.2 TECHNICAL EVALUATION OF PROPOSED CHANGES

To perform the technical evaluation, the NRC staff considered Revision 4 of the UFSAR Section 9.2.7, "Central Chilled Water System," (ADAMS Accession No. ML16193A096), and "Final Safety Evaluation Report for Combined Licenses for Virgil C. Summer Station, Units 2 and 3," (ADAMS Accession No. ML110450305) documenting the staff's technical evaluation of the VCSNS COL application. Although the VWS is nonsafety-related, the low-capacity subsystem provides chilled water for cooling safety-related and defense-in-depth equipment rooms. The staff's evaluation of the changes that are proposed as part of this LAR focuses primarily on confirming that the changes will not adversely affect safety-related SSCs or those that satisfy the criteria for regulatory treatment of non-safety systems (RTNSS), the capability of the VWS to perform its defense-in-depth cooling functions, and RTNSS availability controls. Acceptability was judged based upon conformance with the existing VCSNS COL licensing basis; the guidance specified by NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Section 9.2.2 (as applicable); and SECY-94-084, Policy and Technical Issues Associated with the Regulatory Treatment of Non-Safety Systems in Passive Plant Designs," dated March 28, 1994.

Evolution of system design has resulted in an increase in the footprint of the VWS low capacity air cooled chiller pump module, and in this LAR the licensee proposed to relocate Air-Cooled Chiller Pump 3 and its associated equipment to Annex Building Room 40500, "North Air Handling Equipment Room." This equipment includes an expansion tank, the addition of a new chemical feed tank, and valves and piping. Air Cooled chiller pump VWS-MP-02 and its associated equipment will remain in Auxiliary Building Room 12501. This design change requires changes to COL Appendix C (plant-specific Tier 1), Table 2.7.2-3: Tier 2\* information in UFSAR Section 3H.2.1; Tier 2 UFSAR Section 9.2.7.2.1; and Figure 9.2.7-1 (sheets 1 and 2).

The licensee states in the LAR that relocating Air-Cooled Chiller Pump 3, VWS-MP-03 and associated equipment and the addition of a new chemical feed tank does not affect the ability of the VWS to perform its specified design functions, and the system defense-in-depth functions are not affected by this change. In addition, the only safety-related function of the VWS (to provide containment isolation) is not affected by the changes proposed in the LAR due to spatial separation of the containment isolation portions of the system and the nonsafety-related, non-seismic portions. The licensee concludes that the proposed changes to the low-capacity VWS subsystem will only affect the system configuration of the nonsafety-related, non-seismic VWS and will not affect safety-related equipment or function, design function, or safety analysis.

The staff reviewed the information in the LAR, as well as the VCSNS UFSAR and NRC staff's Final Safety Evaluation Report, to confirm that the proposed changes to the low-capacity VWS are to the nonsafety-related portions of the system. The staff notes that although the low-capacity VWS is not safety-related or subject to RTNSS, the low capacity VWS pumps and chillers are considered important components and identified in UFSAR Table 17.4-1, within the scope of the Design Reliability Assurance Program, because they provide cooling to the chemical volume and control (CVS) makeup pump room. Therefore, the staff reviewed the new system configuration, including the addition of a new chemical feed tank, and confirmed that the changes do not alter or otherwise affect the design specifications to assure the defense-in-depth capability of the low-capacity VWS to provide cooling water to the CVS makeup pump room.

The staff finds the new location in the Annex Building to be an acceptable location for the low-capacity Air-Cooled Chiller Pump 3, VWS-MP-03 and associated equipment, including the addition of a new chemical feed tank, because the equipment does not serve any safety-related functions nor affect SSCs necessary for anticipated transients or postulated accident conditions. In addition, the staff finds that the relocation of the equipment will not negatively affect or compromise the system's ability to perform its design and defense-in-depth-functions. Based on the above evaluation, the staff concludes that the following items involving the proposed licensing basis changes to the sections, tables and figures listed below are acceptable:

- COL Appendix C (and Tier 1) Table 2.7.2-3
- UFSAR Tier 2\* Appendix 3H, Section 3H.2.1
- UFSAR Tier 2 Section 9.2.7.2.1
- UFSAR Tier 2 Figure 9.2.7-1 (Sheet 1 or 4; and Sheet 2 of 4)

The NRC staff evaluated the proposed changes in the LAR and found that these changes will not negatively affect or compromise the chilled water system's ability to perform its design and defense-in-depth-functions. Consequently, the NRC staff concludes that the changes associated with this LAR to the central chilled water system meets the guidance of NUREG-0800, Section 9.2.2, and SECY-94-084, and that the information provided by the applicant as described in this report adequately demonstrates that there is reasonable

assurance that the requirements of 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," GDC 2, and GDC 4 are met. Therefore, the staff finds the proposed changes are acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission regulations in 10 CFR 50.91(b), the designated South Carolina State official was notified of the proposed issuance of the amendment. The State of South Carolina had no comment.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, *Standards for Protection against Radiation*. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite. Also, there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (*Federal Register*, 81 FR 2920; published on January 19, 2016). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

Because the exemption is necessary to allow the changes proposed in the license amendment, and because the exemption does not authorize any activities other than those proposed in the license amendment, the environmental consideration for the exemption is identical to that of the license amendment. Accordingly, the exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the exemption.

#### 6.0 CONCLUSION

The staff has concluded, based on the considerations discussed in Section 3.2 that there is reasonable assurance that: (1) the proposed operation will not endanger health and safety of the public, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Therefore, the staff finds the changes proposed in this license amendment acceptable.

The staff has determined pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52, as addressed in Sections 3.1-3.1.6, above, that the exemption (1) is authorized by law, (2) presents no undue risk to the public health and safety, (3) is consistent with the common defense and security, (4) presents special circumstances, (5) involves special circumstances that outweigh the potential decrease in safety due to standardization, and (6) does not significantly reduce the level of safety at the licensee's facility. Therefore, the staff grants the licensee an exemption from the Tier 1 information requirements as requested by the licensee.



## 7.0 REFERENCES

1. Virgil C. Summer Nuclear Station Units 2 and 3, Submittal of Updated Final Safety Analysis Report Revision 4, dated July 1, 2016 (ADAMS Accession No. ML16193A096).
2. AP1000 Design Control Document, Revision 19, DCD Tier 2, Section 9.2.7, "Central Chilled Water System" dated June 13, 2011 (ADAMS Accession No. ML11171A493).
3. Virgil C. Summer Final Safety Evaluation Report (FSER) dated March 30, 2012 (ADAMS Accession No. ML110450305).
4. Request for License Amendment and Exemption: Relocation of Air Cooled Chiller Pump 3, VWS-MP-03 (LAR 13-31), letter from South Carolina Electric & Gas Company dated October 21, 2015 (ADAMS Accession No. ML15295A090).
5. Supplement 1 to Request for License Amendment and Exemption: Relocation of Air Cooled Chiller Pump 3, VWS-MP-03 (LAR 13-31 S1), letter from South Carolina Electric & Gas Company dated March 31, 2016 (ADAMS Accession No. ML16091A380).
6. Supplement 2 to Request for License Amendment and Exemption: Relocation of Air Cooled Chiller Pump 3, VWS-MP-03 (LAR 13-31 S2), letter from South Carolina Electric & Gas Company dated July 14, 2016 (ADAMS Accession No. ML16196A354).