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Vice President, Nuclear Operations  
803-345-4810



December 11, 2017  
RC-17-0169

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

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NFP-12  
NOTIFICATION OF AN INTENDED CHANGE OF A COMMITMENT  
DATE FOR OPEN PHASE CONDITION (OPC) MADE IN RC-14-0019

References:

1. Thomas D. Gatlin, VCSNS, letter to U. S. Nuclear Regulatory Commission "Response To Request For Additional Information Regarding Response To Bulletin 2012-01 Design Vulnerability In Electric Power System" RC-14-0019 dated February 3, 2014 [ML14035A455]

South Carolina Electric & Gas Company (SCE&G), acting for itself and as an agent for South Carolina Public Service Authority, is providing notification of an intended change to a commitment date. Attachment I details the Bases for the Commitment Date Change and Attachment II provides the List of Commitments.

SCE&G will complete physical installation of the Open Phase Isolation System at VCSNS by the end of 2018 and will complete monitoring mode by June 30, 2020.

This letter contains no new regulatory commitments. The revised commitment is listed in this submittal's Attachment.

If you have any questions about this submittal, please contact Mr. Michael S. Moore, Manager, Nuclear Licensing, (803) 345-4752.

Very truly yours,

A handwritten signature in black ink, appearing to read "George A. Lippard", is written over a horizontal line.

George A. Lippard

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Attachment 1: Bases for the Commitment Date Change  
Attachment 2: List of Commitments

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**VIRGIL C. SUMMER NUCLEAR STATION UNIT 1  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NPF-12**

**ATTACHMENT 1**

**Bases for the Commitment Date Change**

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## 1. Notification

VCSNS intends to adjust the commitment date for full implementation of the Open Phase Isolation System (OPIS) as reported in Reference 1 from December 31, 2018 to June 30, 2020. The installation of Open Phase detection on XTF-4 (Engineered Safeguard Transformer #4) per ECR-50884, "Open Phase Condition (OPC) Strategy for the GDC-17 Offsite Power Sources," has been deferred to RF-24 due to the emergent XTF-31 (Emergency Auxiliary Transformer #1) to XSW1DB (7.2 KV Switchgear, Bus 1DB) cable replacement during RF-23.

## 2. Background

RC-14-0019 states "It is our intention to meet the milestones listed in NEI Initiative Document NEI 2013-12. However, deviations may be required to accommodate outage schedules, software and hardware availability, manufacturer's delivery capabilities, licensing delays or any other unforeseen complications. Any deviation from the NEI Initiative Document NEI 2013-12 schedule will be documented through a deviation/exemption process."

During RF-23, Saulsbury Industries Electricians were pulling the new feeder cable from XSW1B7 to XSW1B switchgear in the Turbine Building (TB), when a buzzing noise was heard in close proximity of an adjacent bus duct. A subsequent investigation revealed evidence of corona damage on multiple XSW1DB feeder cables from XTF-31 at various locations in the bus duct, Turbine Building/ Intermediate Building wall penetration and XTF-31 junction box. OPIS installation for XTF-4 was not completed as a result of the work window being consumed with the emergent issue.

Attachment II of this letter provides the revised implementation milestones for OPIS installation at VCSNS.

## 3. Existing OPIS Equipment

With the goal of ensuring accurate detection without compromising nuclear safety or increasing plant risk, VCSNS is exploring new OPC technology that will be analyzed, evaluated, and tested before entering trip mode.

One of the two GDC-17 credited preferred offsite power sources is the 230kV grid coming into XTF-31. The other GDC-17 credited preferred offsite source is the 115kV grid coming into XTF-4 and XTF-5(Engineered Safeguard Transformer #5). XTF-5 is

rarely put in service since XTF-4 and its associated voltage regulator (XTF-6) is the preferred source.

OPISs were installed in RF-23 for XTF-5 and XTF-31. The OPIS, for XTF-4, has been partially installed and will be completed during RF-24. SCE&G will complete physical installation of the OPIS on XTF-4 by the end of 2018 and enable the trip function by June 30, 2020. The date change does not negatively impact the ability of the licensee personnel to ensure the System Structure Component (SSC) is capable of performing its intended safety function. Existing compensatory measures will remain in place.

Even though the OPIS has been installed on XTF-5, there will not be sufficient time in monitoring mode operation to justify enabling trip mode. The reason for this is that while XTF-5 OPIS is installed, the transformer will be rarely placed in service during the monitoring period. XTF-4 and XTF-5 transformers are the same model so the OPIS monitoring of XTF-4 in the loaded configuration will provide additional information that can be applied to the XTF-5 OPIS.

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**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1  
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**ATTACHMENT 2**

**LIST OF REGULATORY COMMITMENTS**

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The following table identifies those actions committed to by SCE&G, Virgil C. Summer Nuclear Station in Reference 1 of this document as revised by this commitment date change notification. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Michael S. Moore, Manager, Nuclear Licensing, (803) 345-4752.

COMMITMENT	DUE DATE/EVENT
Installation of OPIS on XTF-4	Fall 2018
Enable Trip Function on XTF-31	December 31, 2018
Enable Trip Function on XTF-4 and XTF-5	June 30, 2020
Full Implementation of Open Phase Isolation System	June 30, 2020