

V.C. Summer Nuclear Station
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August 4, 2022

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

Serial No. 22-193
VCS LIC/HK/Rev 0
Docket No. 50-395
License No. NPF-12

DOMINION ENERGY SOUTH CAROLINA (DESC)
VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
ANNUAL COMMITMENT CHANGE SUMMARY REPORT

Dominion Energy South Carolina hereby submits the 2021 Annual Commitment Change Summary Report. The commitment change was performed in accordance with VCSNS Regulatory Commitment Management Program, which was developed following guidance from NEI 99-04 "Guidelines for Managing NRC Commitment Changes."

Should you have any questions, please contact Mr. Michael Moore at (803) 345-4752.

Sincerely,

A handwritten signature in black ink, appearing to read "George A. Lippard", written in a cursive style.

George A. Lippard
Site Vice President
V.C. Summer Nuclear Station

Attachment: Summary of Commitment Changes

cc: G. J. Lindamood – Santee Cooper
L. Dudes – NRC Region II
G. Miller – NRC Project Mgr.
NRC Resident Inspector

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) Unit 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12

ATTACHMENT

SUMMARY OF COMMITMENT CHANGES

The following commitment change, with a brief justification, was performed during 2021 in accordance with the Dominion Energy South Carolina (DESC) Regulatory Commitment Management Program, which was developed following NEI 99-04, "Guidelines for Managing NRC Commitment Changes." The change is documented in the station's corrective action program condition report (CR):

CR-21-01586

Original Commitment Summary – In response to NRC Generic Letter 96-05, VCSNS established a Periodic Verification Program Testing (ML20136H074). Furthermore, while addressing Requests for Additional Information from the NRC in RC-98-0194 (ML20155G554), dated November 2, 1998, VCSNS agreed to meet or exceed the JOG program as described in MPR-1807 and provide justification for and notification of any significant deviations from the JOG program. The NRC's acceptance of the JOG program is provided in their Final Safety Evaluation on Joint Owners' Group Program on Motor-Operated Valve Periodic Verification (TAC NOS. MC2346, MC2347, and MC2348) (ML061280315). Section 3.3 of this document indicates the JOG final TR established static diagnostic test intervals for MOVs, which resulted in the following commitment.

For Class A valves with positive margin, the interval between static PV tests is six years for high-risk valves.

Change – For Class A valves with positive margin, the interval between static PV tests is six years, or four Refueling Outages, for high-risk valves.

Justification for Change – Virgil C. Summer Nuclear Station is on an 18 Month Refueling Cycle. Therefore, a refueling outage frequency of R04 is equal to the 6 years specified in MPR-2524-A ($4 \times 18 \text{ months} = 72 \text{ months} = 6 \text{ years}$).

Planning and Scheduling uses refueling outage frequencies for work being performed during refueling outages.

For preventative maintenance tasks (PMs) with outage frequencies, the PM End Dates are equal to the outage end date. SAP-143 Enclosure A includes a grace period (121 Days) for R04 PMs, however all outage PMs will have been completed (or deferred) before the outage end date which would be months before the specified grace period expires.

The interval between R04 PMs may vary slightly from exactly six years, due to routine variations of outage work window scheduling. The industry typically accounts for that possibility programmatically by specifying a single date at or near the end of refueling outages as the End Date for all PMs due in that refueling outage.