

June 16, 2008

Mr. Jeffery B. Archie
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1, REQUEST FOR
ADDITIONAL INFORMATION – EMERGENCY ACTION LEVEL REVIEW
(TAC NO. MD6874)

Dear Mr. Archie:

By letter dated September 28, 2007 to the U.S. Nuclear Regulatory Commission (NRC), the South Carolina Electric and Gas Company (SCE&G, the licensee) requested NRC review and approve a proposed change to the emergency action level (EAL) scheme used at the Virgil C. Summer Nuclear Station (VCSNS). On May 28, 2008, the NRC staff held a telephone discussion with the SCE&G staff regarding some process changes and issues associated with the NRC review of changes to emergency plans and EALs. The "Procedure and Script for Licensee Calls Concerning Changes in Processing Emergency Plan And Emergency Action Level Reviews" outline for the discussion is available in the Agencywide Documents and Accession Management System (ADAMS), Accession No. ML081410466. As a result of the NRC staff review, a need for additional information was identified, as stated in the enclosure.

Please provide a response the enclosed requests for additional information within thirty (30) days of receipt of this letter.

If you have any questions, please contact me at 301-415-1493.

Sincerely,

/RA/

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosure:
Request for Additional Information

cc w/enclosure: See next page

June 16, 2008

Mr. Jeffery B. Archie
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1, REQUEST FOR
ADDITIONAL INFORMATION – EMERGENCY ACTION LEVEL REVIEW
(TAC NO. MD6874)

Dear Mr. Archie:

By letter dated September 28, 2007 to the U.S. Nuclear Regulatory Commission (NRC), the South Carolina Electric and Gas Company (SCE&G, the licensee) requested NRC review and approve a proposed change to the emergency action level (EAL) scheme used at the Virgil C. Summer Nuclear Station (VCSNS). On May 28, 2008, the NRC staff held a telephone discussion with the SCE&G staff regarding some process changes and issues associated with the NRC review of changes to emergency plans and EALs. The "Procedure and Script for Licensee Calls Concerning Changes in Processing Emergency Plan And Emergency Action Level Reviews" outline for the discussion is available in the Agencywide Documents and Accession Management System (ADAMS), Accession No. ML081410466. As a result of the NRC staff review, a need for additional information was identified, as stated in the enclosure.

Please provide a response the enclosed requests for additional information within thirty (30) days of receipt of this letter.

If you have any questions, please contact me at 301-415-1493.

Sincerely,

/RA/

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosure:
Safety Evaluation

cc w/enclosure: See next page

DISTRIBUTION:

Public
LPL2-1 R/F
RidsNrrDorLp2-1
RidsNrrPMRMartin

RidsAcrsAcnw&mMailCenter
RPedersen, NRR
RidsRgn2MailCenter
RidsNrrLAGLappert

RidsOgcRp

ADAMS Accession: ML081560651

OFFICE	NRR/LPL2-1/PM	NRR/LPL2-1/LA	NSIR	NRR/LPL2-1/BC
NAME	RMartin	GLappert	KWilliams	MWong
DATE	6/16/08	6/5/08	05/29/08	6/16/08

OFFICIAL RECORD COPY

REQUEST FOR ADDITIONAL INFORMATION

SOUTH CAROLINA ELECTRIC & GAS COMPANY

SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 (VCSNS)

DOCKET NO. 50-395

RAI ¹	EAL	QUESTION
1	VARIOUS	Explain the apparent inconsistency in the terms dose rate (milli Rems/hour (mR/hr)) and dose (milli Rems, (mRem)), throughout the September 28, 2007, submittal.
2	VARIOUS	Explain in more detail why credit for the alternate ac power supply (AAC) should be given in the VCSNS EAL scheme.
3	RU1.2	Explain the addition of the statement "...and releases are not terminated within 60-minutes" to the last paragraph of the generic bases.
4	RU2.1	Explain the use of "unexpected" instead of "unplanned" in the generic bases.
5	RA2.1	Explain how SCE&G will differentiate between RA2.1 and RU2.1.
6	RA2.3	Explain why the Central Alarm System (CAS) and Secondary Alarm System (SAS) is necessary for declaration instead of just CAS or just SAS? Explain why the bases wording provided in the guidance was not used.
7	CU1.1	The identified Mode Applicability for CU1.1 is Mode 5 and 6. Your Basis information seems to imply Mode 1-4 applicability, for example, "...to affect a safe shutdown..." Why is that information relevant to CU1.1? Also, please discuss the context of the phrase "Although the AAC is not designed for DBA loads, ..." with respect to the remainder of the Basis.
8	CG2.1 CG2.2	The last bullet in Table C-4 requires further explanation. The applicability is to ANY unplanned pressure rise in containment. No evaluation is expected or justified. Please explain.
9	CA3.1	What is the scale for the instrument(s) that will indicate the 10-psig value?

¹ In a discussion with SCE&G on May 28, 2008, the "Procedure and Script for Licensee Calls Concerning Changes in Processing Emergency Plan And Emergency Action Level Reviews" provided in ADAMS Accession No. ML081410466, SCE&G indicated that it would adopt the Nuclear Energy Institute 99-01, Revision 5 guidance document for EALs with no deviations. Accordingly, no RAIs related to adopting NEI 99-01 Revision 5, wording have been included in these RAIs.

RAI ¹	EAL	QUESTION
10	CU4.1 SU4.2	Can the Radio system inform the NRC? Is the satellite phone system an ordinary means of communication, or tested frequently? If tested, how often and where is this controlled? Why are the other FTS phones (HPN, etc.) not used?
11	CU5.1	How is the last sentence of paragraph 1 (basis) applicable to this EAL?
12	HU1.1	Elaborate on the timeliness of the actions needed to assess the annunciators and retrieve data, including the availability of qualified personnel to make this determination.
13	NEI HU1.5	Explain why an EAL for hurricanes, seiche, etc, as stated in the guidance, is not provided?
14	HU3.1 HA3.1	Elaborate on how it was determined that paragraph 1 of the generic basis is correct.
15	HU6.1	Justify the inclusion of the last paragraph of the bases.
16	SA2.1 SS2.1 SG2.1	Why is Hot Standby included as an Operating Mode for SA2.1? Only actions taken at the reactor control console can be considered, not tripping the turbine or other control room actions that cause a trip. Elaborate on why this is considered appropriate or revise to be consistent with the guidance.
17	SA4.1	The last paragraph, "Significant transients are listed . . ." is incomplete. Please provide a complete sentence/paragraph.
18	SU5.2	Why is the last sentence of the first paragraph in the generic basis section included? Please elaborate.
19	FB	Explain in more detail why no 'other' loss or potential loss thresholds were developed.

Virgil C. Summer Nuclear Station

cc:

Mr. R. J. White
Nuclear Coordinator S.C. Public Service Authority
c/o Virgil C. Summer Nuclear Station Post Office Box 88, Mail Code 802
Jenkinsville, SC 29065

Resident Inspector/Summer NPS
c/o U.S. Nuclear Regulatory Commission
576 Stairway Road
Jenkinsville, SC 29065

Chairman, Fairfield County Council
Drawer 60
Winnsboro, SC 29180

Mr. Henry Porter, Assistant Director
Division of Waste Management
Bureau of Land & Waste Management
Dept. of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

Mr. Thomas D. Gatlin, General Manager
Nuclear Plant Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88, Mail Code 300
Jenkinsville, SC 29065

Mr. Bruce L. Thompson, Manager
Nuclear Licensing
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88, Mail Code 830
Jenkinsville, SC 29065

Ms. Kathryn M. Sutton
Morgan, Lewis & Bockius LLP
111 Pennsylvania Avenue, NW.
Washington, DC 20004