



April R. Rice
Manager
New Nuclear Licensing

October 30, 2014
NND-14-0563
10 CFR 52.99(c)(1)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Virgil C. Summer Nuclear Station (VCSNS) Unit 2
Combined License No. NPF-93
Docket Number 52-027
ITAAC Closure Notification for ITAAC C.3.8.01.05.02.02

Attachments: References

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.99(c)(1) of the completion of Virgil C. Summer Nuclear Station (VCSNS) Unit 2 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.3.8.01.05.02.02 which confirms the Emergency Operations Facility (EOF) habitability is consistent with NUREG-0696 (Reference 1). The closure process for this ITAAC is based on the guidance described in NEI 08-01 (Reference 2), which was endorsed by the NRC in Regulatory Guide 1.215.

ITAAC Statement

Design Commitment:

5.2 The licensee has established an EOF. [H.2]

Inspections, Tests, Analyses:

5.2 An inspection of the EOF will be performed, including a test of the capabilities. The EOF is located outside of the 10 mile Emergency Planning Zone.

Acceptance Criteria:

5.2.2 The EOF habitability is consistent with Table 2 of NUREG-0696.

- *Distance at or beyond 10 mi of the TSC*
- *Built to meet the criteria of the County Building Code*

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate an EOF has been established and meets the requirements of NUREG-0696. This ITAAC performs an inspection of the distance between the TSC and the EOF to verify they are at least 10 miles apart and verifies that the EOF is built in accordance with the County Building Code.

As described in the VCSNS Emergency Plan (Reference 3) the EOF is located at least 10 miles beyond the Technical Support Center (TSC). NUREG 0696, Table 2 requires that for EOFs at or beyond 10 miles of the TSC, the structure must be well engineered for the design life of the plant. Part 2, Section H of the VCSNS Emergency Plan states that the EOF meets the criteria of NUREG-0696 regarding location, structure, habitability, size, communications, instrumentation, data system equipment, power supplies, technical data, records availability and management.

Inspection of the Certificate of Occupancy issued by Richland County (Reference 4) shows that the Certificate of Occupancy documents that the EOF is built in accordance with the County Building Code.

A licensed professional surveyor performed an inspection using standard survey techniques of the straight line distance between the TSC and the EOF in accordance with job specific field instructions. The survey took GPS points at the south side of the building containing the TSC and the north side of the EOF facility to determine the straight line distance between facilities.

The results are documented in Certified Survey Data for ITAAC-C.3.8.1.5, Emergency Facilities and Equipment (Reference 5). The distance between the TSC and EOF was determined to be 11.74 miles which meets the Acceptance Criteria of at or beyond 10 miles.

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, SCE&G performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.3.8.01.05.02.02 (Reference 6) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SCE&G hereby notifies the NRC that ITAAC C.3.8.01.05.02.02 was performed for VCSNS Unit 2 and that the prescribed acceptance criteria are met.


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Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

We request NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99(e)(1).

If there are any questions, please contact Ryder Thompson at (803) 941-9812.

Sincerely,


for April R. Rice
Manager
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New Nuclear Deployment

RCT/AR/jl

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References (available for NRC inspection):

1. NUREG-0696, Functional Criteria for Emergency Response Facilities
2. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
3. VCSNS Radiation Emergency Plan – Units 2 & 3
4. Richland County Commercial Certificate of Occupancy
5. Certified Survey Data for ITAAC-C.3.8.1.5, Emergency Facilities and Equipment
6. ITAAC C.3.8.01.05.02.02 Completion Package