



April R. Rice
Manager
New Nuclear Licensing

October 30, 2014
NND-14-0560
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 3
Combined License No. NPF-94
Docket Number 52-028
ITAAC Closure Notification for ITAAC C.3.8.01.05.01.01

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 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.3.8.01.05.01.01 for verifying that Technical Support Center (TSC) has at least 3000ft² of floor space. The closure process for this ITAAC is based on the guidance described in NEI 08-01 (Reference 1), which was endorsed by the NRC in Regulatory Guide 1.215.

ITAAC Statement

Design Commitment:

5.1 The licensee has established a TSC and onsite OSC. [H.1, H.9]

Inspections, Tests, Analyses:

5.1.1 An inspection of the TSC and OSC will be performed, including a test of the capabilities. These facilities will meet the criteria of NUREG-0696 with exceptions.

Acceptance Criteria:

5.1.1 The TSC has at least 3000 ft² of floor space.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that a TSC and onsite OSC have been established and meet the requirements of NUREG-0696 (Reference 2). This ITAAC performs inspections of the TSC to verify that it has at least 3000 ft² of floor space.

NUREG-0696, Section 2.4 requires the TSC to have a minimum working space provided of approximately 75 ft² per person for the personnel assigned to the TSC at maximum level of occupancy. NUREG-0696 also requires the TSC be sized for a minimum of 25 persons, including 20 persons designated by the licensee and 5 NRC personnel. Part 2, Section H of the VCSNS Emergency Plan (Reference 3) describes the emergency facilities and equipment, including the TSC. The Emergency Plan states that the VCSNS TSC is sized for approximately 40 personnel, which includes provisions for NRC personnel.

A licensed professional surveyor performed an inspection and dimensional check of the floor space of the TSC utilizing standard survey techniques in accordance with job specific field instructions. Two independent instruments were utilized to determine the dimensions of the TSC and any obstructions that reduced the floor space were measured and subtracted from the overall floor space area.

The results are documented in Certified Survey Data for ITAAC-C.3.8.1.5, Emergency Facilities and Equipment (Reference 4). The floor space of the TSC was determined to be 6324 ft² which meets the acceptance criteria of at least 3000 ft².

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.3.8.01.05.01.01 (Reference 5) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SCE&G hereby notifies the NRC that ITAAC C.3.8.01.05.01.01 was performed for VCSNS Unit 3 and that the prescribed acceptance criteria are met.

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).

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

Sincerely,

for Justin Booknight
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New Nuclear Deployment

RCT/AR/jl

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References (available for NRC inspection):

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. NUREG 0696, Functional Criteria for Emergency Response Facilities
3. VCSNS Radiation Emergency Plan – Units 2 & 3
4. Certified Survey Data for ITAAC-C.3.8.1.5, Emergency Facilities and Equipment
5. ITAAC C.3.8.01.05.01.01 Completion Package