



December 27, 2017  
NND-17-0503

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

Virgil C. Summer Nuclear Station (VCSNS) Units 2 & 3  
Combined License (COL) Nos. NPF-93 and NPF-94  
Docket Nos. 52-027 & 52-028

Subject: South Carolina Electric & Gas Company (SCE&G) Request for  
Withdrawal of VCSNS Unit 2&3 COLs

References: 1. Letter from Jeffrey B. Archie to NRC, V.C. Summer, Units 2 and 3 -  
Notification of Termination of Project Construction, dated  
August 17, 2017 (ML17229B487)

This letter requests NRC approval to withdraw the COLs for VCSNS Units 2 & 3 in accordance with the Commission's policy statement on deferred and terminated plants (52 Federal Register 38,077). In Reference 1, SCE&G notified the NRC that as of July 31, 2017, SCE&G stopped construction activities on the VCSNS Units 2 and 3 site. In its October 27 letter, SCE&G stated that it would notify the NRC of its plans for disposition of the COLs no later than December 15. Pursuant to further discussion with the NRC, SCE&G stated that it would notify the NRC by the end of December 2017.

The COLs were obtained from the NRC in March of 2012 and construction commenced shortly thereafter. On March 29, 2017, the Company's General Contractor, Westinghouse Electric Company, unexpectedly declared bankruptcy. Subsequently SCE&G and the project's co-owner (the South Carolina Public Service Authority-Santee Cooper) undertook an evaluation of the cost and schedule to complete the units. On July 31, 2017, Santee Cooper made the decision to suspend work on the project and later that day SCE&G made the decision to abandon the project effective immediately.

There is no nuclear fuel or special nuclear material on the site and all Safeguards Information has been removed from the site. Also, in their present state of construction (less than 40% complete), neither of the units can be considered a utilization facility as defined in 10CFR50.2. Neither unit has all the necessary structures, systems or components in place to sustain a controlled nuclear reaction. Currently there are no construction or quality-related activities ongoing at the site, but SCE&G will continue to comply with NRC requirements pending its authorization of withdrawal.

In addition to withdrawal of the COLs, SCE&G requests withdrawal of the License Amendment Requests and associated Exemptions under NRC review, Code Alternative requests under NRC review, and all ITAAC Closure Notifications.

SCE&G has irrevocably abandoned its interests in VCSNS Units 2 and 3 project. All of its project completion and preservation activities have ceased. Work is limited to only those actions required to place the site in a safe condition, terminate construction, and close active permits. No further NRC-regulated activities are being performed or planned at VCSNS 2 and 3.

SCE&G has offered to cede its abandoned interest in the VCSNS Units 2 and 3 project to the South Carolina Public Service Authority (Santee Cooper), for no consideration. As of the time of this letter, Santee Cooper has not elected to accept full responsibility for the VCSNS Units 2 and 3 project. If prior to NRC approval of this request to withdraw the COLs Santee Cooper chooses to seek to become the sole licensee for the project, SCE&G will support an application to the NRC to transfer the licenses to Santee Cooper.

The enclosure provides SCE&G's plans for redress of the Unit 2 & 3 site and additional information on site activities. SCE&G is not requesting a specific approval date for withdrawal of the COLs, however, prompt approval will allow for resolution.

This letter contains no regulatory commitments.

Should you have any questions, please contact me at (803) 217-5080 or by email at [jarchie@scana.com](mailto:jarchie@scana.com).

Sincerely,



Jeffrey B. Archie  
Senior Vice President SCANA  
Senior Vice President & CNO SCE&G

JRB/JBA/

Enclosure

c: Billy Gleaves  
Jennifer Dixon-Herrity  
Shawn Williams  
Tomy Nazario  
Cathy Haney  
Vonna Ordaz  
Fred Brown  
Jim Reece  
Kevin B. Marsh  
Jimmy E. Addison  
Stephen A. Byrne  
W. Keller Kissam  
Jeffrey B. Archie

Jim Stuckey  
Alvis J. Bynum  
Kathryn M. Sutton  
Roger Reigner  
Justin R. Bouknight  
Shirley S. Johnson  
Susan E. Jenkins  
William M. Cherry  
Rhonda M. O'Banion  
vcsummer2&3project@westinghouse.com  
VCSummerMail@westinghouse.com  
DCRM-EDMS@SCANA.COM

## **V.C. SUMMER UNITS 2 AND 3 REDRESS PLAN**

Jenkinsville, South Carolina

South Carolina Electric and Gas Company

December 2017

V.C. Summer Unit 2 and 3 Redress Plan  
Jenkinsville, South Carolina  
South Carolina Electric and Gas Company

**Site Description**

The Virgil C. Summer Nuclear Station (VCSNS), Units 2 and 3 site is located on approximately 1,988 acres adjacent to the Broad River near Jenkinsville, South Carolina. As of July 2017, when South Carolina Electric and Gas Company (SCE&G) terminated construction at the site, the Units were approximately 40 percent complete. Since the plant never became operational, no nuclear fuel or waste is on site. The only radioactive material to be disposed of would result from removal of smoke detectors and exit signs from various buildings to be demolished or abandoned in place. Safeguards Information has been removed. Fenced areas are currently under industrial-type security.

**The current environmental permit status of VCS is as follows:**

Air – General Minor Source Operating Permit status granted September 1, 2010, by the South Carolina Department of Health & Environmental Control (SCDHEC) for Concrete Batch Plant. Expiration date June 30, 2023.

Toxics – There are no polychlorinated biphenyl (PCB) transformers on site; however, there are other PCB-containing items/equipment/articles on site but not in service.

Wastes (Environmental Protection Agency Identification Number SCD069311579):

Hazardous – Large Quantity Generator

Solid – Presently disposed of offsite by contract at a SCDHEC-permitted facility.

Wastewater (National Pollutant Discharge Elimination System [NPDES] Permit Number SC0049131) – Construction and permanent sewage currently routed to the Town of Whitmire, SC. The current NPDES permit expires on January 31, 2018.

Water – Drinking water for the site is purchased from the city of Jenkinsville, a community public water system regulated by the state.

Army Corp of Engineer- SAC-2007-1852-SIR granted March 30, 2012 to impact 0.26 acres of wetlands, 1.34 acres of jurisdictional waters, and 774 linear-feet of stream. Expiration date March 31, 2022.

NPDES General Permit for Stormwater Discharges from Construction Activities- Approximately fifteen (15) phased construction permits encompassing approximately 900 acres of total disturbed area on-site.

### **Potential Impacts**

SCE&G would maintain the VCSNS 2 & 3 site in compliance with environmental requirements, including after NRC withdrawal of the COLs. Compliance activities would primarily consist of inspection and maintenance of the site in accordance with construction stormwater permits. These measures would continue as long as SCE&G has ownership of the VCS site or until the site is stabilized and stormwater permits are terminated. Maintaining and complying with these existing permits and regulations would ensure the stability of the site.

Most of the minor environmental impacts resulting from redress would be associated with removal of equipment or structures not identified as necessary for other site activities. Materials and structures removed would be above grade or in areas that have previously experienced substantial ground disturbance for the original construction of the plant. The Units 2 and 3 switchyard has previously been placed in-service and is operating on SCE&G's transmission system. SCE&G currently plans to maintain the Unit 2 and 3 transmission switchyard as-is. Under current plans, the existing containment, turbine, and associated support buildings would not be demolished but would remain in their currently constructed state. The other structures not identified as necessary would be removed from the site, abandoned in place, or demolished. These structures are mostly temporary office and storage buildings and warehouses. Any demolition wastes generated would be disposed of in appropriately-permitted waste disposal facilities.

Equipment identified as unnecessary would have the power disconnected and abandoned in place. Such items may include, but are not limited to: valves; battery boards and chargers; transfer switches; vent fans; motors; cabinet panels; breakers; power systems; shop equipment such as lathes, air compressors, and dryers; as well as other miscellaneous equipment. Additional materials on site include, but are not limited to items such as: piping, tubing, and conduit; cable; instrumentation; and general construction materials. SCE&G would continue to conduct periodic site inspections to ensure that none of the equipment or materials are causing environmental, health, or safety problems.

Redress would also involve the removal of approximately 250,000 gallons of oil and miscellaneous fuel and lubricants located in approximately fifty (50) areas site-wide. Equipment such as generators, above ground storage tanks, and transformers have a capacity range between 200-15,000 gallons per source. Fuel and lubricant would be removed and storage containers would be closed in accordance with all applicable federal, state, or local laws and regulations.

SCE&G has both Corporate and site processes and procedures in place to safely handle the demolition and removal of the identified equipment, structures, and fuels or lubricants in an environmentally sound manner.

### **Cumulative Impacts**

Because the redress activities at the VCS site would constitute minor, insignificant, routine activities, there would be no cumulative impacts associated with the redress activities.

### **Mitigation Measures**

There would be no additional mitigation measures other than the routine mitigation measures, i.e., best management practices.