



K. Chad Burgess
Director & Deputy General Counsel

chad.burgess@scana.com

November 15, 2017

VIA HAND DELIVERY

Jeffrey M. Nelson, Esquire
Shannon B. Hudson, Esquire
Andrew M. Bateman, Esquire
South Carolina Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

RE: South Carolina Electric & Gas Company Activities and Events Related
to the Intention to Abandon V.C. Summer for Units 2 73 Site in
Jenkinsville, SC

Dear Counsel:

Enclosed on behalf of South Carolina Electric & Gas Company ("SCE&G" or "Company") you will find three (3) copies of the Company's responses to the South Carolina Office of Regulatory Staff's First Continuing Audit Information Request for Records and Information and Second Continuing Audit Information Request for Records and Information. As requested, SCE&G's responses are bound in three-ringed binders with numbered tabs between each question. Also enclosed as requested is a compact disc which contains an electronic copy of SCE&G's responses.

Also per your request and by copy of this letter, we are providing Gary Jones with a compact disc containing an electronic copy of the Company's responses.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

K. Chad Burgess

KCB/kms
Enclosures

cc: Gary Jones
(via Federal Express overnight delivery w/enclosures)

IN RE: South Carolina Electric & Gas Company) Office of Regulatory Staff's First
 Activities and Events Related to the Intention) Continuing Audit Information
 to Abandon V.C. Summer for Units 2 & 3) Request for Records and
 Site in Jenkinsville, SC) Information
)

**TO: K. CHAD BURGESS, ESQ., MATTHEW W. GISSENDANNER, ESQ., AND
BYRON HINSON REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC
& GAS COMPANY:**

I. INSTRUCTIONS

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to S.C. Code Ann. § 58-4-55(A), 58-27-160, and 58-27-1570 that South Carolina Electric & Gas Company ("SCE&G" or "Company") provide responses in writing and under oath and serve the undersigned on or before November 8, 2017 to the attention of Shannon Bowyer Hudson of ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201 and to the attention of Gary Jones of Jones Partners at 1555 North Astor Street, Apt. 22W, Chicago, IL 60610. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these audit requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word "document" is

used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- Pursuant to S.C. Code Ann. § 58-4-55(A) that responses be submitted under oath.
- All information shall be provided to ORS and Gary Jones of Jones Partners in the format requested.
- All responses to the requests below must be labeled using the same numbers as the requests.
- Unless otherwise agreed, the requested information shall be bound in 3-ring binders with numbered tabs between each question. The question should be reproduced at the beginning of each tab for the responses included. All exhibits shall be reduced or expanded to 8 ½" x 11" formats, where practical.
- If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- Any inquiries or communications requesting clarification of the information requested should be directed to Jeffrey M. Nelson, Esquire [803.737.0823], Shannon Bowyer Hudson, Esquire [803.737.0889] or M. Anthony James [803.737.2090] of ORS.
- This entire list of questions shall be reproduced and included in front of each set of responses.
- Unless otherwise set forth below, SCE&G shall provide three (3) paper copies/binders of responses to ORS. In addition, and if technically feasible, it is requested that SCE&G provide one (1) electronic version with working spreadsheets (not in Adobe) each to ORS and to Gary Jones of Jones Partners [gary@jonespartners.net].

- If the response to any request is that the information requested is not currently available, please state when the information requested will be provided to ORS. This statement is not a waiver of the deadline for all other responses.
- In addition to the signature and verification at the close of SCE&G's responses, the SCE&G witness(es), employee(s), contractor(s) or agent(s) responsible for the information contained in each response shall be indicated.
- This request shall be deemed to be continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available.
- If the information requested is kept, maintained, or stored using spreadsheets, please provide fully functional electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- Provide all responses to reflect SCE&G's 55% participation where possible. Where this request is not possible, please clearly identify whether the responses reflect 100% or 55% dollars.

II. REQUESTS

- 1-1. Please provide copies of any Company correspondence, requests for information and responses, oral or written, from or to any other person or entity that may relate to the information being provided in this Audit Information Request regarding SCE&G's V.C. Summer New Nuclear Units 2 & 3 in Jenkinsville, SC (the "Units" or "Project").
- 1-2. Please provide:
 - a) An itemized list of all costs associated with maintaining the current status of equipment at the Project;
 - b) A spreadsheet with a detailed breakdown of all contractor costs, on-site and off-site, supporting the current maintenance and preservation of equipment;
 - c) A spreadsheet with a detailed breakdown by contractor/vendor of the outstanding invoices required to be paid by the Company that were requested prior to SCE&G's decision to abandon the Project; and
 - d) SCE&G's written plan, procedures and schedule developed to achieve and maintain a safe and stable abandonment status at the construction site.
- 1-3. Provide a spreadsheet with a detailed breakdown of all SCE&G costs, on-site and off-site, supporting maintenance and preservation of equipment per year.
- 1-4. For owners costs, please provide an itemized list of all costs for labor, non-labor, and non-split portions, including current and anticipated costs to achieve and maintain a safe and stable abandonment status at the construction site.

- 1-5. For transmission costs, please provide an itemized list of all costs for labor, non-labor, and non-split portions, including current and anticipated costs to achieve a safe and stable abandonment status at the construction site.
- 1-6. Please provide a list of contractors that are currently supplying services to include the scope of work and related costs for services. Please identify any of these contractors which have a lien against SCE&G.
- 1-7. Please provide a list of all liens against SCE&G related to the Units and the unpaid balance for each.
- 1-8. Please provide a list of contractor equipment on-site that is necessary to achieve and maintain a safe and stable abandonment status at the construction site. Please provide the monthly cost for this equipment, and the anticipated termination date for removing this equipment.
- 1-9. Please provide a list of contractor equipment that remains on site, and any unpaid balance associated with this equipment. If SCE&G is responsible for an unpaid balance and the owner is seeking to take possession its equipment, please provide the process that allows the equipment to be released to the owner, and the anticipated release date.
- 1-10. Please provide a list of remaining SCANA/SCE&G staffing, their duties, position title, salary, and a timeline of the anticipated staff departure dates due to the abandonment.
- 1-11. Please provide a breakdown of state and federal regulatory costs by statute or regulation required to achieve and maintain a safe and stable abandonment status at the construction site.
- 1-12. Please list and identify by location all areas which have been backfilled to achieve and maintain a safe and stable abandonment status at the construction site.
- 1-13. Please provide the final staffing requirements and anticipated budget for maintaining staff on-site after the Company has achieved a safe and stable abandonment status at the construction site.
- 1-14. Please identify any outside resources that the Company will require to maintain the site and the remaining equipment in safe and stable abandonment status.
- 1-15. Please identify and itemize all of SCE&G's costs associated with the Project prior to the Westinghouse Electric Company ("WEC") Bankruptcy, SCE&G's path to minimizing those costs and its strategy to recover any remaining unrecovered costs.
- 1-16. The following structures for the Units are over 50% complete:
 - a) Service Building
 - b) Water Treatment Plant
 - c) Cooling Towers
 - d) Simulator equipment and training programs

- e) Switchyard
- f) Shooting Range

- 1-17. Please describe the Company's determination as to completing or abandoning these facilities and any future use of these facilities based on that determination.
- 1-18. Please provide contractor and Company staff severances, bonus payments, and contract breach costs associated with the abandonment.
- 1-19. Please identify the equipment/components that require an inert gas purge or blanket and the actions being taken to ensure the appropriate storage requirements are maintained.
- 1-20. Please discuss SCE&G's decision to either maintain, suspend or terminate its combined operating license ("COL"). Also provide the date this decision must be formally conveyed to Nuclear Regulatory Commission ("NRC").
- 1-21. Please describe any additional NRC requirements and actions the Company must take if it elects to maintain, suspend or terminate its COL license and a timeline for such actions.
- 1-22. Provide a list of documents that have been provided and will need to be provided to the NRC as a result of SCE&G's announcement of its intention to abandon the Units.
- 1-23. ORS understands the NRC requires a written plan of abandonment as a result of SCE&G's intentions to abandon the Units. Please provide that written plan upon completion.
- 1-24. Please discuss the required records needed to maintain the COL license.
- 1-25. Please provide the current status of Inspections, Tests, Analyses, and Acceptance Criteria ("ITAAC") for the Units, a list of completed ITAACs and the steps SCE&G is taking to preserve the ITAAC database.
- 1-26. Please identify what state or federal permits are necessary to achieve and maintain a safe and stable abandonment status at the construction site. Also, discuss what actions the Company is taking to meet these permit requirements.
- 1-27. Please discuss the status of transferring the American Society of Mechanical Engineers qualifications from WEC to SCE&G.
- 1-28. Please provide a list of all equipment that has been sold or disposed of since the abandonment decision and the reason for the action.
- 1-29. Please provide a list of remaining equipment deliveries and the cost of each item.
- 1-30. Please provide the results of the most recent equipment inventory and plant walk-down.

- 1-31. Please describe the actions SCE&G has taken to ensure the proper preservation of equipment and component remaining on site.
- 1-32. Please discuss the Company's quality assurance program with regard to demobilization activities.
- 1-33. Please provide the status of the training simulators for the Units and the associated training materials. Also, discuss the Company's decision regarding the simulator (e.g., retain, salvage).
- 1-34. Please provide a categorized list of all unpaid invoices to include the dollar amount associated with each invoice.
- 1-35. Please provide a list of any and all items that have been salvaged and the dollar amount received from each salvaged item.
- 1-36. Please provide a list of any and all items anticipated to be salvaged and the estimated dollar amount to be received from each salvaged item.
- 1-37. Please discuss the level and processes in place to ensure adequate security for the site.
- 1-38. Please identify and list all equipment and buildings associated with the Units that will be supporting V.C. Summer Unit 1 after the abandonment.
- 1-39. Please provide an estimated cost to preserve the site for future restart (within 2 years, 5 years and 10 years).
- 1-40. Please provide a copy of the process to be used by WEC and SCE&G to determine ownership of equipment and components related to the Units.
- 1-41. Please provide a comprehensive list of major equipment and components by owner (WEC or SCE&G) related to the Units
- 1-42. Please provide any agreements/contracts between SCE&G and salvage vendors.
- 1-43. Provide all written documents detailing the cost of abandoning versus preserving or "mothballing" the site.

Shannon B. Hudson

Jeffrey M. Nelson, Esquire
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South Carolina Office of Regulatory Staff
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Columbia, South Carolina
October 30, 2017

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-1:

Please provide copies of any Company correspondence, requests for information and responses, oral or written from or to any other person or entity that may relate to the information being provided in this Audit Information Request regarding SCE&G's V.C. Summer New Nuclear Units 2 & 3 in Jenkinsville, SC (the "Units" or "Project").

RESPONSE 1-1:

On November 3, 2017, the South Carolina Office of Regulatory Staff granted SCE&G's request to hold the Company's response to this request in abeyance.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-2:

Please provide:

- a) A itemized list of all costs associated with maintaining the current status of equipment at the Project;
- b) A spreadsheet with a detailed breakdown of all contractor costs, on-site and off-site, supporting the current maintenance and preservation of equipment;
- c) A spreadsheet with a detailed breakdown by contractor/vendor of the outstanding invoices required to be paid by the Company that were requested prior to SCE&G's decision to abandon the Project; and
- d) SCE&G's written plan, procedures and schedule developed to achieve and maintain a safe and stable abandonment status at the construction site

RESPONSE 1-2:

- a) SCE&G has abandoned the Project, is evaluating salvage options and is not preserving the site for future use. To assist SCE&G with its evaluation of salvage options, SCE&G has retained the services of Saulsbury Industries, Inc. to maintain the current status of certain equipment at the Project on a limited basis. Attached to this response is a spreadsheet which reflects the costs that SCE&G anticipates incurring as a result of maintaining certain equipment until a final decision has been made regarding salvage. These costs consists of (i) security; (ii) preventative maintenance; (iii) warehouse leases; and (iv) SCE&G internal labor.
- b) Please see Response 1-2(a).
- c) Please see attached.
- d) SCE&G is not in possession of any written plan or procedures responsive to this audit information request; however, attached to this response is the most current version of SCE&G's schedule to achieve and maintain a safe and stable abandonment status at the construction site.

SCE&G % Ownership

ORS AIR 10/30/17

Response to Questions 1-2(a), 1-2(b), and 1-3

	2017	2018	Total
Security	\$ 369,808	\$ 531,960	\$ 901,768
Preventative Maintenance Work			
Saulsbury Industries Inc.	\$ 100,649	\$ 902,757	\$ 1,003,406
Warehouse Leases			
Offsite Warehouse Leases	\$ 543,158	\$ 978,798	\$ 1,521,956
Warehouse Equipment	\$ 23,497	\$ 93,988	\$ 117,485
Internal Labor			
Internal Labor	\$ 28,674	\$ 63,082	\$ 91,755
Total Cost	\$ 1,065,785	\$ 2,570,584	\$ 3,636,369

Name	Amount
ADVANCED VIDEO GROUP INC	\$ 21,911.05
AIRSWIFT	\$ 6,550.00
ALLIED SPECIALTY RESOURCES LLC	\$ 114,144.60
BECHTEL POWER CORPORATION	\$ 19,856.30
BETTER AUTOMATION DESIGNS INC	\$ 5,113.90
BOOZ ALLEN HAMILTON INC	\$ 57,310.38
BUNNELL-LAMMONS ENGINEERING INC	\$ 1,309.50
CDW DIRECT	\$ (69.64)
CERTREC CORPORATION	\$ 18,760.00
FIBERLINK LLC	\$ 14,465.16
FLASH TECHNOLOGY	\$ 40.00
G4S SECURE SOLUTIONS (USA) INC	\$ 44,387.30
GLOBAL QUALITY ASSURANCE INC	\$ 36,167.68
GRAYBAR ELECTRIC CO	\$ 6,173.19
GREGORY PEST SOLUTIONS	\$ 312.00
HSB CT	\$ 9,636.06
HYATT PLACE COLUMBIA HARBISON	\$ 410.40
M B KAHN CONSTRUCTION CO INC	\$ 2,128,263.00
MORGAN LEWIS BOCKIUS LLP	\$ 4,954.50
NEFF RENTAL LLC	\$ 3,115.28
P & S CONSTRUCTION CO INC	\$ 7,610.50
PMQ SERVICES	\$ 81,620.00
POOLED EQUIPMENT INVENTORY CO (PEICO)	\$ 5,395.30
PREFERRED LICENSING SERVICES INC	\$ 149,739.87
REED SMITH LLP	\$ 317,750.18
ROMTEC UTILITIES	\$ 50,658.96
SMITH CURRIE & HANCOCK LLP	\$ 47,407.26
SOUTHERN BACKGROUND SERVICES LLC	\$ 3,390.00
SPHERION STAFFING LLC	\$ 3,371.80
SYSTEM ONE HOLDINGS LLC	\$ 29,836.16
SYSTEMTEC	\$ 8,526.00
TEK SYSTEMS	\$ 3,920.00
THE STRESS CENTER	\$ 733.55
URS NUCLEAR LLC	\$ 238,772.62
US NUCLEAR REGULATORY COMMISSION	\$ 1,732,258.54
WATER ENVIRONMENT CONSULTANTS	\$ 8,900.00
WEST INTERACTIVE SERVICES CORPORATION	\$ 7,847.39
WESTINGHOUSE ELECTRIC COMPANY LLC	\$ 208,500.00
FLUOR ENTERPRISES INC	\$ 13,509,980.80
TOTAL	\$ 18,909,029.59

data date 08/17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
1	Demob						
2	Chemistry - OWS operators						
3	Operate the system while transitioning - System and components must	Rick Mike	24w	08-Aug-17 A	02-Feb-18	Sorapuru, Newbanks	
4	Chemistry - Haz Waste						
5	Maintain oversight and/or take ownership for hazardous waste disposal - PO has been issued to handle this item	Rick Mike	16w	08-Aug-17 A	05-Sep-17 A	Hollowood	
6	HP Support of U1 Operational and ERO						
7	NND HP staff has been completing quals and gaining experience	Roberts	4w	08-Aug-17 A	22-Sep-17 A	Long, Jones, Moore, Chapman	
8	HP Technical and Logistics Support						
9	Work with Southern and General Atomic to reconcile current inventory with list of sources provided by Westinghouse	Roberts	2w	08-Aug-17 A	29-Aug-17 A	Roberts, Mike	
10	Transfer CRs impacting Unit 1 from the NND to Unit 1 CR database. Both HP and Safety	Roberts	4w	08-Aug-17 A	29-Aug-17 A	Roberts, Mike	
11	Work with DE/PSE to determine possible uses for AP-1000 RMS monitors	Roberts	4w	08-Aug-17 A	05-Sep-17 A	Roberts, Mike	
12	Work with M&P to determine possibility of returning or selling AP-1000 RMS monitors	Roberts	4w	08-Aug-17 A	05-Sep-17 A	Roberts, Mike	
13	Revise NND-HP-002 Control of Radioactive Material during Construction	Roberts	4w	08-Aug-17 A	05-Sep-17 A	Roberts, Mike	
14	Develop TWR to ensure compliance with 10 CFR 20.1301 using 2nd qtr TLD results and occupancy logs. Awaiting TLD results	Roberts	6w	08-Aug-17 A	22-Sep-17 A	Roberts, Mike	
15	Ship or transfer radioactive sources to Unit 1 or other Licensee	Roberts	8w	08-Aug-17 A	22-Sep-17 A	Roberts, Mike	
16	Update procedures / processes for Alarm Response to Building #338 and the OSGRF (Mausoleum)	Ellison	2w	08-Aug-17 A	07-Nov-17	Ellison	
17	Perform surveys, inventory and monitoring of Radioactive Sources per NND-HP-002 until sources are removed	Ellison	8w	08-Aug-17 A	07-Nov-17	Ellison	
18	Support Nuclear Licensing with termination of COL	Ellison	8w	08-Aug-17 A	07-Nov-17	Ellison	
19	Work with M&P to determine status of Calibration Sources. (were they paid for? They are necessary for RMS operations)	Ellison	6w	08-Aug-17 A	07-Nov-17	Ellison	
20	Coordinate with General Atomic to have Calibration sources shipped to Unit 1	Ellison	8w	08-Aug-17 A	07-Nov-17	Ellison	
21	HP Industrial Safety						

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
22	Inventory and secure safety equipment which might be useable	Roberts	3w	08-Aug-17 A	05-Sep-17 A	Higgenbotham	
23	Securing exposure records and injury records for litigation purposes	Roberts	3w	08-Aug-17 A	05-Sep-17 A	Higgenbotham	
24	Provide safety oversight of demobilization	Ellison	8w	08-Aug-17 A	01-Dec-17	Higgenbotham	
25	Licensing - COL - License and Permit Closeout						
26	Determine options for path forward on COL for VCSNS 2&3	Rice	4w	07-Aug-17 A	05-Sep-17 A	Bouknight, Rice	
27	Ensure orderly transition of any needed permits to Unit 1 licensing or other appropriate party (OWS)	Rice	16w	07-Aug-17 A	28-Sep-17 A	Waller, Bouknight, Rice	
28	Present options for permit paths forward to management for direction	Rice	12w	07-Aug-17 A	05-Oct-17 A	Waller, Bouknight, Rice	
29	Work with regulatory agencies and legal counsel to execute paths forward to abandon (or otherwise disposition) COL	Rice	16w	07-Aug-17 A	15-Dec-17	Bouknight, Rice	
30	Ensure (along with entire transition team) continued compliance to licenses, permits, & regulatory requirements during	Rice	16w	07-Aug-17 A	15-Dec-17	Rice	
31	Notify NRC and SCDHEC of project abandonment	Rice	0w	08-Aug-17 A	08-Aug-17 A	Waller, Bouknight, Rice	
32	ITAAC Schedule Update	Rice	3w	11-Sep-17 A	22-Sep-17 A	Rice, Bouknight	
33	Operational Programs Schedule Update	Rice	3w	11-Sep-17 A	22-Sep-17 A	Rice, Bouknight	
34	Notify NRC of transfer of radioactive sources to Unit 1	Rice	5w	25-Sep-17 A	17-Oct-17 A	Rice, Bouknight	
35	Remove all oil products and containers per 40CFR112	Rice	0w	09-Oct-17 A	28-Dec-17	Waller, Bouknight	
36	Update Spill Prevention, Control and Countermeasure Plan	Rice	0w	09-Oct-17 A	28-Dec-17	Waller, Bouknight	
37	Submit to the NRC a plan for disposition of the COLs and pending LARs (per NND-17-0464)	Rice	3w	10-Oct-17 A	15-Dec-17	Bouknight	
38	Weekly site storm water inspections	Rice	2w	01-Nov-17 A	02-Nov-17 A	Waller	
39	Weekly site storm water inspections	Rice	2w	01-Nov-17 A	02-Nov-17 A	Waller	
40	Weekly site storm water inspections	Rice	2w	08-Nov-17	09-Nov-17	Waller	
41	Weekly site storm water inspections	Rice	2w	15-Nov-17	16-Nov-17	Waller	
42	Weekly site storm water inspections	Rice	2w	22-Nov-17	29-Nov-17	Waller	

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
43	Weekly site storm water inspections	Rice	1w	30-Nov-17	30-Nov-17	Waller	
44	Weekly site storm water inspections	Rice	2w	06-Dec-17	07-Dec-17	Waller	
45	Weekly site storm water inspections	Rice	2w	13-Dec-17	14-Dec-17	Waller	
46	Weekly site storm water inspections	Rice	2w	20-Dec-17	21-Dec-17	Waller	
47	Weekly site storm water inspections	Rice	2w	27-Dec-17	28-Dec-17	Waller	
48	Weekly site storm water inspections	Rice	2w	03-Jan-18	04-Jan-18	Waller	
49	Departures Report	Rice	3w	15-Jan-18*	01-Feb-18	Rice, Bouknight	
50	Fukushima response status report - Implement Overall Integrated Plan for Mitigation Strategies for beyond design basis	Rice	3w	31-Jan-18*	20-Feb-18	Rice, Bouknight	
51	Decision to withdraw SCDHEC NPDES renewal application by Feb 2018	Rice	0w	16-Feb-18*	16-Feb-18	Archie	
52	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Mar-18*	28-Mar-18	Archie	
53	ITAAC Schedule Update	Rice	3w	21-Mar-18	11-Apr-18	Rice, Bouknight	
54	Operational Programs Schedule Update	Rice	3w	21-Mar-18	11-Apr-18	Rice, Bouknight	
55	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Apr-18*	28-Apr-18	Archie	
56	Annual 50.46 Submittal	Rice	3w	02-May-18*	22-May-18	Rice, Bouknight	
57	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-May-18*	28-May-18	Archie	
58	Annual FSAR Update	Rice	6w	21-May-18*	29-Jun-18	Rice, Bouknight	
59	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Jun-18*	28-Jun-18	Archie	
60	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Jul-18*	28-Jul-18	Archie	
61	Departures Report	Rice	3w	01-Aug-18	21-Aug-18	Rice, Bouknight	
62	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Aug-18*	28-Aug-18	Archie	
63	Fukushima response status report - Implement Overall Integrated Plan for Mitigation Strategies for beyond design basis	Rice	3w	20-Aug-18	10-Sep-18	Rice, Bouknight	
64	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Sep-18*	28-Sep-18	Archie	
65	ITAAC Schedule Update	Rice	3w	09-Oct-18	29-Oct-18	Rice, Bouknight	
66	Operational Programs Schedule Update	Rice	3w	09-Oct-18	29-Oct-18	Rice, Bouknight	
67	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Oct-18*	28-Oct-18	Archie	
68	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Nov-18*	28-Nov-18	Archie	
69	Contingency - Submit NPDES monthly DMR's if renewal application is not withdrawn	Rice	1w	18-Dec-18*	28-Dec-18	Archie	

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
70	Departures Report	Rice	3w	18-Feb-19	08-Mar-19	Rice, Bouknight	
71	Fukushima response status report - Implement Overall Integrated Plan for Mitigation Strategies for beyond design basis	Rice	3w	11-Mar-19	29-Mar-19	Rice, Bouknight	
72	Annual 50.46 Submittal	Rice	3w	20-May-19	10-Jun-19	Rice, Bouknight	
73	Annual FSAR Update	Rice	6w	25-Jun-19	06-Aug-19	Rice, Bouknight	
74	Annual 50.46 Submittal	Rice	3w	05-Jun-20	25-Jun-20	Rice, Bouknight	
75	Annual FSAR Update	Rice	6w	03-Aug-20	14-Sep-20	Rice, Bouknight	
76	Licensing - COL - Records Requirements						
77	Required records retention for COL and permit termination and procurement record	Rice	17w	08-Aug-17 A	08-Dec-17	Griffin	
78	M&P - Receiving, Storage, Salvage						
79	Obtain resources required for remaining deliveries	Campbell	2w	07-Aug-17 A	22-Aug-17 A	Graves, Tritapoe, Hyde	
80	Obtain Software Needs (Documentum and SmartPlant Materials) - duplicate, closed out	Campbell	2w	07-Aug-17 A	28-Aug-17 A	Graves, Hyde, Bradley	
81	Obtain Required Documentation for equipment and Inventory - duplicate, closed out	Campbell	26w	07-Aug-17 A	28-Aug-17 A	Graves, Tritapoe, Hyde	
82	Resolve QA/ASME Program	Campbell	3w	07-Aug-17 A	10-Nov-17	Graves, Tritapoe, Verrilli, Mervak	
83	Obtain Resources Required for Sales	Campbell	2w	07-Aug-17 A	30-Nov-17	Graves, Hyde	
84	Receive remaining deliveries	Campbell	12w	22-Aug-17 A	15-Dec-17	Graves, Tritapoe, Raymond	
85	Perform inventory and plant walkdowns	Campbell	3w	22-Aug-17 A	03-Nov-17 A	Graves, Tritapoe, Campbell, Verrilli, Mervak	
						Page 4 of 10	

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
86	Process remaining invoices - duplicate, closed out	Campbell	16w	25-Aug-17 A	28-Aug-17 A	Tritapoe, Raymond, Wright, Wright	
87	Convert documentation from Documentum to Filenet - duplicate, closed out	Campbell	15w	28-Aug-17 A	28-Aug-17 A	Graves, Tritapoe, Griffin, Jolley, Cohen	
88	Prioritize list of equipment and inventory	Campbell	4w	29-Aug-17 A	15-Dec-17	Campbell	
89	Sell Equipment and Inventory	Campbell	21w	29-Aug-17 A	09-Feb-18	Graves, Tritapoe, Raymond, Wright	
90	PO to surplus supplier to manage sales	Campbell	7w	29-Aug-17 A	09-Feb-18	Graves, Tritapoe, Foster	
91	Ops Procedures						
92	Develop a change management plan	Harris, Al	2w	08-Aug-17 A	05-Sep-17 A	Williams, Norgaard	
93	Revise / Issue SAP-139	Harris, Al	2w	08-Aug-17 A	30-Oct-17 A	Williams	
94	Revise MD-100	Harris, Al	2w	08-Aug-17 A	08-Nov-17	Williams	
95	Revise MD (Management Directives)	Harris, Al	4w	18-Sep-17 A	10-Nov-17	Williams	
96	Revise VCS procedures	Harris, Al	6w	06-Nov-17*	19-Dec-17	Williams	
97	Revise editorial changes to U1 procedures that reference U2/3	Harris, Al	13w	06-Nov-17*	08-Feb-18	Williams	
98	QA - QAPD update						
99	Revise QSP-108	Harris, Les	2w	31-Oct-17 A	02-Nov-17 A	Quigley	
100	Revise and update the Unit 1 QAPD	Harris, Les	6w	06-Nov-17	19-Dec-17	Quigley	
101	Interface Review and comment resolution	Harris, Les	2w	20-Dec-17	04-Jan-18	Quigley	
102	Issue Unit 1 QAPD	Harris, Les	0w	05-Jan-18	05-Jan-18	Quigley	
103	QA - Quality Assurance Program						

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
104	Perform QA Program Review	Verrilli	3w	07-Aug-17 A	28-Aug-17 A	Verrilli	
105	Perform periodic oversight of demobilization efforts and activities performed to control materials/components	Verrilli	24w	07-Aug-17 A	22-Jan-18	Verrilli	
106	Develop Regulatory Commitment / QA Program "Reminder Communication" to Unit 2/3 staff	Verrilli	1w	15-Aug-17 A	28-Aug-17 A	Verrilli	
107	Develop Temporary Transition Plan for QA Program (for next 60-90 days)	Verrilli	3w	15-Aug-17 A	12-Sep-17 A	Verrilli	
108	Develop "limited" SCE&G Quality Assurance Program (QAPD for demobilization activities & control of materials/components	Verrilli	3w	21-Aug-17 A	05-Oct-17 A	Verrilli	
109	Establish a QA Review and Verification Process for the ASME and Safety Related Component/Material data packages	Verrilli	3w	02-Oct-17 A	01-Dec-17	Verrilli	
110	Complete QA Review and Verification Process for the ASME and Safety Related Component/Material data packages	Verrilli	15w	02-Oct-17 A	24-Jan-18	Verrilli	
111	Security Access Control						
112	Urgency in getting records updated in Nsmart, Empact (badging system)	Haselden	6w	08-Aug-17 A	03-Nov-17 A	Gilbert	
113	Follow up with Westinghouse on support of information needed for Annual FFD Report	Haselden	13w	23-Oct-17 A	31-Jan-18		
114	Security FFD Program						
115	Determine FFD requirements for WARN employees	Haselden	3w	08-Aug-17 A	05-Sep-17 A	Lewis, Eleazer, Kelly	
116	Training - Paperwork and Simulator Closeout						
117	Removal of Units 2/3 staff from Plateau and other databases	Barbee	19w	01-Aug-17 A	15-Dec-17	Jordan	
118	Confer SRO Cert for CL3 and others (provide supporting documents)	Barbee	4w	07-Aug-17 A	21-Aug-17 A	Martel	
119	Training History and supporting documents for NLOs (includes TPE record, etc.) on request	Barbee	4w	07-Aug-17 A	21-Aug-17 A	Bundrick	
120	Training History and supporting documents for Instructors (includes TPE record, etc.)	Barbee	4w	07-Aug-17 A	21-Aug-17 A	Bundrick	
121	Training History and supporting documents for 24 successful licensed candidates (supports Vogtle)	Barbee	4w	07-Aug-17 A	21-Aug-17 A	Meier	
122	Stabilize all M&T lab equipment and prepare any data needed to transfer ownership	Barbee	4w	07-Aug-17 A	05-Sep-17 A	Hunsicker	
123	Stabilize and demobilize the 2 CAS simulators, SDS, and classroom sims to ready them for potential sale.	Barbee	4w	07-Aug-17 A	05-Sep-17 A	Lawter	
124	Demobilize all instructor cubes.	Barbee	4w	07-Aug-17 A	15-Sep-17 A	Meier	

data date 01/17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
125	Disposition open CRs with U1 implications in mind. Use approved closure statement and write U1 CR's when necessary	Barbee	4w	07-Aug-17 A	15-Sep-17 A	Carter	
126	Authenticate and transmit records for all classes completed or in progress	Barbee	4w	07-Aug-17 A	15-Sep-17 A	Meler	
127	Contain NRC exam materials/pedigree & obtain necessary approvals before transfer to Vogtle. Work w/legal on sale-ability	Barbee	4w	07-Aug-17 A	15-Sep-17 A	Meier	
128	Training History and supporting documents for M&T staff (includes TPE record, etc.) on request	Barbee	4w	07-Aug-17 A	15-Sep-17 A	Hunsicker	
129	Training - U1 Contractor Replacment						
130	Unit 1 is training several new hire maintenance staff. Much of the initial training material requires a revision.	Barbee	13w	08-Aug-17 A	03-Nov-17 A	Angel	
131	Construction						
132	Establish a process and review WEC and other contractor/subcontractor invoice charges for prudence to project end	Wicker	14w	08-Aug-17 A	29-Dec-17	Gillespie	
133	Ensure that Owner's assets are properly retained or salvaged	Johnson	20w	08-Aug-17 A	29-Dec-17	Gillespie	
134	IT						
135	OWS network connectivity for VCS Unit 1		0w	10-Oct-17 A	10-Oct-17 A	Bradley	
136	Transition fiber	Bradley	11w	13-Nov-17*	06-Feb-18	Bradley	
137	Cameras for security(corporate)	Bradley	11w	13-Nov-17*	06-Feb-18	Bradley	
138	Transfer network offsite Warehouses to corporate security	Bradley	11w	13-Nov-17*	06-Feb-18	Bradley	
139	Waste Water System (WWS)						
140	Determine the steps required to stabilize the Raw Water System Intake under the US Army Corps of Engineers 404 Permit	Johnson	8w	22-Aug-17 A	29-Sep-17 A	Hydrick	
141	WWS Stabilization	Johnson	8w	21-Sep-17 A	15-Jan-18	Hydrick, Merriman	
142	Remove diffuser piping and cofferdam	Johnson	8w	09-Oct-17 A	05-Jan-18	Hydrick, Merriman	
143	Update Corps of Engineers permit / FERC license to reflect as-left site conditions	Rice	8w	09-Oct-17 A	31-Jan-18	Stutts, Argentieri	
144	Barge and crane mobilization and demob	Johnson	8w	26-Oct-17 A	15-Jan-18	Hydrick, Merriman	
145	Yard						
146	Walk all areas down to determine full scope required to make structures safe	Johnson	16w	08-Aug-17 A	16-Oct-17 A		
147	Establish schedule for retention pond maintenance, Determine which SC DHEC Construction Stormwater permits	Young	16w	08-Aug-17 A	01-Dec-17	Waller	

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
148	Review and determine which laydown areas can be left as is and which must be mitigated to bring into compliance	Young	16w	08-Aug-17 A	01-Dec-17	Young	
149	Yard Fire System-turn over to Unit 1 ERU	Scoma	4w	22-Aug-17 A	16-Oct-17 A		
150	Unit One Piping Work. ECR to connect to U1	Scoma	9w	13-Nov-17*	19-Jan-18	Young	
151	Hazardous Waste						
152	Determine method of disposal for hazardous waste left on site	Johnson	16w	08-Aug-17 A	01-Dec-17	Young	
153	Nuclear Island						
154	Walk down all supports and raceways to determine structural soundness, document and weld out or remove	Johnson	8w	08-Aug-17 A	16-Oct-17 A	Savastano	
155	U2NI West MSFW Penetration Removal (Stargate)		1w	23-Aug-17 A	16-Oct-17 A		
156	Administrative						
157	Maintain Construction Schedule	Torres	8w	08-Aug-17 A	19-Dec-17	Hydrick	
158	Review of final WEC invoices for prudency	Torres	8w	08-Aug-17 A	29-Dec-17	Thompson, McKenzie	
159	Design in Filenet	Scoma	0w	27-Feb-18*	27-Feb-18	Young	
160	Offsite Water System (OWS)						
161	Complete Offsite Water System Steffy input - Continue to provide direction and project management to complete OWS	Bennett	24w	08-Aug-17 A	02-Feb-18	Gibbons, Scoma	
162	Labeling	Harris, AI	4w	10-Aug-17 A	27-Nov-17	Slaughter, Morris, Tuten, Mandish	
163	Tank Grounding		6w	05-Sep-17 A	16-Nov-17	Gibbons, Thompson	
164	Fluor Grout MT-04A	Scoma	1w	26-Sep-17 A	02-Oct-17 A	Thompson	
165	Cubex PLC Testing	Scoma	4w	16-Oct-17 A	28-Nov-17	Gibbons	
166	Saulsbury Punchlist Work Off	Scoma	13w	16-Oct-17 A	07-Feb-18	Gibbons	
167	Jacobs Drawing Update	Scoma	16w	16-Oct-17 A	26-Feb-18	Gibbons	
168	Obtain DHEC Op Permits (OWS)	Scoma	3w	06-Nov-17*	27-Nov-17	Reese	
169	Potable Water Available	Scoma	0w	28-Nov-17*	28-Nov-17	Thompson	
170	Raw Water System (RWS)						
171	RWS Stabilization	Brinkley	8w	14-Aug-17 A	08-Dec-17	Stutts, Argentero, Brinkley	

data date 06/17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
172	RWS Intake structure shoreline recovery	Brinkley	8w	14-Aug-17 A	08-Dec-17	Stutts, Argentieri, Brinkley	
173	Determine the steps required to stabilize the Raw Water System Intake under the US Army Corps of Engineers 404 Permit	Torres	8w	22-Aug-17 A	02-Oct-17 A	Inman	
174	Update Corps of Engineers permit / FERC license to reflect as-left site conditions	Brinkley	8w	09-Oct-17 A	21-Dec-17	Stutts, Argentieri	
175	Service Building (A30)						
176	Building stabilization - Building A30 service building is within 3 to 4 weeks of completion and ready to occupy,	Johnson	16w	08-Aug-17 A	01-Dec-17	Brinkley	
177	Backfill						
178	Backfill all current excavation that do not require flowable concrete fill, Develop and implement a plan to install	Young	16w	08-Aug-17 A	01-Dec-17	Brinkley	
179	Sub-Contract Demobilization						
180	Ensure Owner's Assets are identified, secured & not improperly moved from their location during demob	Young	6w	08-Aug-17 A	17-Jan-18		
181	CBIS Demobilization	Young	5w	28-Aug-17 A	27-Nov-17	Gillespie	
182	K2 Demobilization	Young	6w	28-Aug-17 A	28-Nov-17	Gillespie	
183	Superior Air Handling Demobilization	Young	6w	28-Aug-17 A	05-Dec-17	Gillespie	
184	Evaptech Demobilization	Young	12w	28-Aug-17 A	22-Jan-18	Gillespie	
185	Pike		3w	01-Sep-17 A	22-Sep-17 A	Parler	
186	CA Murren		4w	01-Sep-17 A	13-Oct-17 A	Parler	
187	TurbinePros		4w	01-Sep-17 A	14-Oct-17 A	Parler	
188	Envirovac Rolling Stock	Young	1w	01-Sep-17 A	10-Nov-17	Parler	
189	MJ Wood Demobilization	Young	4w	05-Sep-17 A	29-Nov-17	Gillespie	
190	CES Tent Demobilization	Young	1w	11-Sep-17 A	27-Nov-17	Gillespie	
191	AZZ Demobilization	Young	1w	13-Nov-17*	17-Nov-17	Parler	
192	S&ME	Young	2w	13-Nov-17*	28-Nov-17	Parler	
193	Mistras	Young	2w	13-Nov-17*	28-Nov-17	Parler	
194	CES Nuclear Island Demobilization	Young	4w	13-Nov-17*	12-Dec-17	Parler	
195	HSG Demobilization	Young	4w	13-Nov-17*	12-Dec-17	Parler	
196	Envirovac NI/TI Scope	Young	4w	13-Nov-17*	12-Dec-17	Parler	
197	Equipment Demobilization						
198	Develop plan to allow contractors to demobilize their site equipment including property oversight,	Torres	8w	08-Aug-17 A	16-Oct-17 A	Parler	

data date 06-17		Demob			(demob) 06-Nov-17 09:20		
#	Activity Name	Owner	Dur	Start	Finish	Resources	
199	Support NND construction and WEC to formulate a demobilization plan for 3rd party rental equipment	Torres	3w	08-Aug-17 A	07-Nov-17	Gillespie	
200	Remove all AirGas equipment from site	Torres	4w	30-Aug-17 A	31-Jan-18	Gillespie	
201	Add Send Letter to DHEC once Batch Plant silos are removed	Rice	8w	15-Nov-17*	15-Jan-18	Waller	
202	Cranes						
203	Recovery of 3rd Party Rental Cranes	Young	15w	14-Aug-17 A	09-Mar-18	Parler	
204	Terminate FAA permits for cranes, HLD, Met Tower	Rice	1w	15-Dec-17*	21-Dec-17	Waller	
205	Site Buildings						
206	TSC -Resources needed to finish the TSC filter ECR will require 4 engrs (1/discipline) through the end of the yr.	Taylor	20w	08-Aug-17 A	16-Oct-17 A	Watkins, Kaler, Mothena, Lewis, Kirkland Bradley	
207	Remove SCANA network gear from Building 23		1w	02-Oct-17 A	04-Oct-17 A		
208	Remove SCANA network gear from Engineering 13 Plex	Brinkley	0w	13-Nov-17*	14-Nov-17	Broom	
209	Remove SCANA network gear from Ops 12 Plex	Brinkley	0w	13-Nov-17*	14-Nov-17	Broom	
210	Remove SCANA network gear from NRC trailers	Brinkley	6w	13-Nov-17*	29-Dec-17	Broom	
211	Remove SCANA network gear from Building 15	Brinkley	6w	13-Nov-17*	29-Dec-17	Broom	
212	Remove SCANA network gear from Building 310 (inside protected area)	Brinkley	6w	13-Nov-17*	29-Dec-17	Broom	
213	Remove SCANA network gear from Building 113	Brinkley	19w	13-Nov-17*	29-Mar-18	Broom	
214	Temporary Facilities						
215	Recover Appliances		0w	05-Sep-17 A	02-Oct-17 A	Thompson	
216	Clean out trash	Young	0w	05-Sep-17 A	06-Nov-17	Thompson	
217	Remove Buildings (Subcontractor)-SCANA	Young	6w	16-Oct-17 A	12-Dec-17	Thompson, Parler	
218	Remove Foundations - SCANA	Young	6w	13-Nov-17*	29-Dec-17	Young	
219	Disconnect Utilities -SCANA	Young	10w	13-Nov-17*	29-Jan-18	Young	
220	Sell items to get remaining rental equipment and trailers off site	Young	4w	01-Dec-17	04-Jan-18	Young	
221	Personnel						
222	Develop schedule for WEC and Fluor staff to remove personal belongings	Torres	16w	08-Aug-17 A	03-Nov-17 A	Torres	

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-3:

Provide a spreadsheet with a detailed breakdown of all SCE&G costs, on-site and off-site, supporting maintenance and preservation of equipment per year.

RESPONSE 1-3:

Please see SCE&G Response 1-2.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-4:

For owners costs, please provide an itemized list of all costs for labor, non-labor and non-split portions, including current and anticipated costs to achieve and maintain a safe and stable abandonment status at the construction site.

RESPONSE 1-4:

Please see attached. All costs related to achieving and maintaining a safe and stable abandonment status at the construction site are shared expenses between SCE&G and Santee Cooper using the 55%-45% split historically associated with the Project. Accordingly, there are no non-split portions associated with these expenses.

SCE&G % Ownership
ORS AIR 10/30/17

Response to Question 1-4

Internal Labor	
NND Team	\$ 805,873
SCANA Serv Support	\$ 825,444
NonLaobr	
IST	\$ 157,953
On-going Facilities Maintenance/Cleaning buildings	\$ 131,711
On-going fees for PC Leases, Network Connectivity, Desk Phones, Cell Phones	\$ 1,003,119
Construction Equipment Rental	\$ 1,595,000
Fluor	\$ 6,058,668
Security	\$ 251,723
Remaining Scopes of Work	\$ 1,942,203
Total	\$ 12,771,693

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-5:

For transmission costs, please provide an itemized list of all costs for labor, non-labor, and non-split portions, including current and anticipated costs to achieve a safe and stable abandonment status at the construction site.

RESPONSE 1-5:

SCE&G will complete the transmission projects included in the transmission line item of its BLRA capital costs budget and therefore will not incur costs related to abandonment of these projects.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-6:

Please provide a list of contractors that are currently supplying services to include the scope of work and related costs for services. Please identify any of these contractors which have a lien against SCE&G.

RESPONSE 1-6:

Please see attached.

**SCE&G % Ownership
ORS AIR 10/30/17
Attachment 1-6**

Supplier/Contractor	Description/Scope of Work	Estimated Average Monthly Cost	Lien Filed
Neff Rental	WWS Trench Box Rental	\$ 5,500	No
Ascendum Machinery	Loader & Articulating Dump Rental	\$ 17,614	Yes
Big Red Inc	Taylor Forklift rental	\$ 3,713	No
Big Red Inc	Forklift Rental at Metro	\$ 3,438	No
Blanchard Machinery	Rental of Various Pieces of Equipment	\$ 30,896	Yes
General Equipment & Supply	Drop Deck Trailer Rental	\$ 1,141	No
HERC	Equipment Rental	\$ 57,688	Yes
HERC	Forklift Rental at Metro	\$ 3,342	Yes
American Piledriving Equipmng	Vibratory Hammers for Sheet Pile Removal	\$ 8,250	No
ASAP Expediting	Freight for Vibratory Hammers	\$ 1,100	No
D & J Machinery	Barge for RWS/WWS Sheet Pile Removal	\$ 8,983	No
L.B. Foster	WWS/RWS Sheet Piling Equipment Rental	\$ 36,785	No
Polygon	Humidifer rental	\$ 536	Yes
Blythwood Oil	Fuel and Diesel delivery services	\$ 13,200	Yes
Tucker Oil/Westside Ice	Ice Delivery Services	\$ 1,100	No
WESCO	For Flotation Devices	\$ 227	No
Carolina's Rigging	For Pile Driving Shackles	\$ 1,034	No
Airgas USA	Oxygen, Acetylene, Cutting Torches for WWS/RWS Sheet Pile Removal	\$ 917	Yes
Bagwell Fence Co. Inc.	Vendor to provide and install fenceing	\$ 1,854	Yes
Fluor Enterprises	Site Stabilization Services	\$ 550,000	Yes
EcoFlo	Hazardous Waste Removal	\$ 2,750	No
Saulsbury Industries, Inc.	Perform Preventative Maintenance and Testing as requested by NND.	\$ 334,469	No
Palmetto Automatic Sprinkler	Fire Suppression System Repairs and Adjustments	\$ 917	No
Crandall Corporation	Disposal of Regulated Waste	\$ 8,919	No
Thompson Services	Portable toilet rental	\$ 20,221	Yes
Republic Services	Waste Container Rental/Disposal Services	\$ 11,000	No
Bulldog Erectors	Crane Rental/Demob Support	\$ 163,295	Yes
Steelfab	Steel storage charges	\$ 32,083	Yes
Carolina Pines	Blythwood Storage Lease	\$ 36,300	No
375 Metropolitan	Metro Storage Lease	\$ 72,050	No

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-7:

Please provide a list of all liens against SCE&G related to the Units and the unpaid balance for each.

RESPONSE 1-7:

Please see attached.

Response 1-7

Name	Date Opened	Lien Claim Amount
Structural Preservation Systems LLC v SCE&G	3/22/2017	\$ 454,203
Thompson Industrial Services, LLC vs. Wectec Contractors, Inc., f/k/a/ CB&I Shaw Constructors, Inc	3/28/2017	\$ 714,008
Intertech Security, LLC vs. 484 Bradham Blvd.	3/30/2017	\$ 192,821
HSG Constructors, LLC, f/k/a Harsco Services Group, LLC vs. 14368 Highway 213, Jenkinsville SC	3/31/2017	\$ 545,155
Specialty Maintenance & Construction, Inc., A Subsidiary of Metaltek International, Inc. vs. South Carolina Electric & Gas Company	4/3/2017	\$ 666,806
Specialty Maintenance & Construction, Inc., A Subsidiary of Metaltek International, Inc. vs. South Carolina Electric & Gas Company	4/3/2017	\$ 604,660
Baker Concrete Construction, Inc vs. South Carolina Electric and Gas Company	4/7/2017	\$ 819,593
Bubba Tool LTD, LLC vs. South Carolina Electric & Gas Company	4/7/2017	\$ 222,299
N.W. White & Company vs. South Carolina Electric & Gas Company	4/7/2017	\$ 269,519
The Lane Construction Corporation vs. South Carolina Electric & Gas Company	4/7/2017	\$ 168,259
Dennis Corporation vs. VC Summer	4/10/2017	\$ 156,130
Cives Steel vs. SCE&G	4/16/2017	\$ 277,045
Five Star Products vs. SCE&G	4/16/2017	\$ 233,122
Shelby Mechanical v SCE&G	4/16/2017	\$ 330,775
Fluor Enterprises, Inc	4/17/2017	\$ -
Ram Tool & Supply Co., Inc	4/17/2017	\$ 160,167
Graybar Electric Company vs SCE&G	4/19/2017	\$ 114,296
POLYGON US CORPORATION v. WECTEC GLOBAL PROJECT SERVICES, INC., F/K/A CB&I STONE & WEBSTER, INC., F/K/A STONE & WEBSTER INC.	4/19/2017	\$ 22,892
POLYGON US CORPORATION v. WECTEC GLOBAL PROJECT SERVICES, INC., F/K/A CB&I STONE & WEBSTER, INC., F/K/A STONE & WEBSTER INC.	4/19/2017	\$ 27,754
POLYGON US CORPORATION v. WECTEC GLOBAL PROJECT SERVICES, INC., F/K/A CB&I STONE & WEBSTER, INC., F/K/A STONE & WEBSTER INC.	4/19/2017	\$ 11,913
RSCC Wire & Cable LLC v. South Carolina Electric & Gas Company	4/19/2017	\$ 1,766,462
Tioga Pipe, Inc vs SCE&G	4/20/2017	\$ 61,183
Ascendum Machinery Inc vs SCE&G	4/21/2017	\$ 353,550
HD Supply Construction Supply vs SCE&G	4/24/2017	\$ 11,283
Newport News Industrial Corp vs SCE&G	4/24/2017	\$ 7,990,040
POLYGON US CORPORATION v. WECTEC GLOBAL PROJECT SERVICES, INC., F/K/A CB&I STONE & WEBSTER, INC., F/K/A STONE & WEBSTER INC.	4/24/2017	\$ 7,095

Response 1-7

Amec Foster Wheeler Environment & Infrastructure Inc vs SCE&G Company and Santee Cooper	5/1/2017	\$	305,979
GENERAL SUPPLY & SERVICES, INC D/B/A GEXPRO v. SOUTH CAROLINA ELECTRIC & GAS COMPANY	5/8/2017	\$	544,035
Oldcastle Precast, Inc. vs. Wectec Global Project Services, Inc., f/k/a CB&I Stone & Webster, Inc., f/k/a Stone & Webster, Inc	5/8/2017	\$	83,505
TINDALL CORPORATION v. SOUTH CAROLINA ELECTRIC & GAS COMPANY	5/8/2017	\$	1,029,483
Airtool Equipment Rental Inc vs SCE&G	5/8/2017	\$	59,598
The Lincoln Electric Company vs Wectec Global Project	5/9/2017	\$	166,151
International Drilling Equipment Inc	5/9/2017	\$	5,288
Greenberry Industrial LLC vs SCE&G Company	5/11/2017	\$	1,961,073
TINDALL CORPORATION v. SOUTH CAROLINA ELECTRIC & GAS COMPANY	5/11/2017	\$	128,256
Myers & Chapman, Inc. vs. Westinghouse Electric Company, LLC	5/12/2017	\$	10,523
Electrical Equipment Company vs SCE&G & SCPSC	5/15/2017	\$	121,484
Evaptech v SCE&G	5/17/2017	\$	7,398,449
Bagwell Fence Co Inc. vs. South Carolina Electric & Gas Company	5/18/2017	\$	13,926
Bridgewell Resources, LLC vs. South Carolina Electric & Gas Company	5/19/2017	\$	92,320
DuBose National Energy Services, Inc. vs. South Carolina Electric & Gas Company	5/19/2017	\$	1,526,965
United Rentals (North America), Inc vs. South Carolina Electric & Gas Company	5/19/2017	\$	592,658
The Calvert Co VS SCE&G & SCANA	5/23/2017	\$	386,229
HD Supply Construction Supply vs SCE&G	5/23/2017	\$	146,414
CBI Services, LLC f/k/a CBI Services, Inc. vs. South Carolina Electric & Gas Company	5/31/2017	\$	11,289,600
CBI Services, LLC f/k/a CBI Services, Inc. vs. South Carolina Electric & Gas Company	5/31/2017	\$	1,828,955
CBI Services, LLC f/k/a CBI Services, Inc. vs. South Carolina Electric & Gas Company	5/31/2017	\$	53,218
Maxim Crane Works, L.P. vs. South Carolina Electric & Gas Company	5/31/2017	\$	139,425
S&ME, Inc vs. South Carolina Electric & Gas Company	5/31/2017	\$	76,141
Airgas USA, LLC, d/b/a Airgas National Welders vs. Wectec Global Project Services, Inc., f/k/a CB&I Stone & Webster, Inc., f/k/a Stone & Webster, Inc.	6/2/2017	\$	477,505
Gregory Electric Company, Inc vs. South Carolina Electric & Gas Company a/k/a SCE&G	6/2/2017	\$	38,581
Skyline Steel, LLC vs. C. A. Murren & Sons Company, Inc	6/2/2017	\$	13,142
Tyler Construction Group, Inc. vs. South Carolina Electric and Gas Company	6/5/2017	\$	392,783

Response 1-7

CB&I Laurens, Inc. f/k/a B.F. Shaw, Inc. vs. South Carolina Electric & Gas Company	6/6/2017	\$	548,523
CB&I Laurens, Inc. f/k/a B.F. Shaw, Inc. vs. South Carolina Electric & Gas Company	6/6/2017	\$	1,043,937
Curtiss-Wright Electro-Mechanical Corporation vs South Carolina Electric & Gas Company	6/8/2017	\$	2,707,879
Enertech, A Division of Curtiss-Wright Flow Control Corporation vs. South Carolina Electric & Gas Company	6/8/2017	\$	80,124
Nova Machine Products, Inc vs. South Carolina Electric & Gas Company	6/8/2017	\$	868,138
Carolina Fabricators, Inc.	6/9/2017	\$	143,595
Barnhart Crane and Rigging, Inc vs South Carolina Electric & Gas - SCANA Land Department	6/9/2017	\$	468,636
Consolidated Electrical Distributors, Inc. vs. South Carolina Electric & Gas Company	6/13/2017	\$	82,281
Forterra Pressure Pipe, Inc. vs. VCS/Westinghour	6/14/2017	\$	82,995
Ssm Industries, Inc. vs. South Carolina Electric & Gas	6/15/2017	\$	850,861
Cannon Sline Industrial Inc vs SCE&G	6/15/2017	\$	2,529,976
SMI-Owen Steel Company, Inc. vs SCE&G & SCPSC	6/16/2017	\$	22,437
Sargent & Lundy, L.L.C. vs. South Carolina Electric & Gas Company	6/19/2017	\$	299,126
Gregory Electric Company, Inc vs. South Carolina Electric & Gas Company a/k/a SCE&G	6/20/2017	\$	9,136
Gregory Electric Company, Inc vs. South Carolina Electric & Gas Company a/k/a SCE&G	6/20/2017	\$	24,138
Gregory Electric Company, Inc vs. South Carolina Electric & Gas Company a/k/a SCE&G	6/20/2017	\$	88,870
Eaton Corporation vs. Wectec Global Project Services, Inc	6/22/2017	\$	54,423
Eaton Corporation vs. Wectec Global Project Services, Inc	6/22/2017	\$	17,947
Eaton Corporation vs. Wectec Global Project Services, Inc	6/22/2017	\$	169,190
Eaton Corporation vs. Wectec Global Project Services, Inc	6/22/2017	\$	2,159
Eaton Corporation vs. Wectec Global Project Services, Inc	6/22/2017	\$	127,568
Eaton Corporation vs. Wectec Global Project Services, Inc	6/22/2017	\$	14,470
Eaton Corporation vs. Wectec Global Project Services, Inc	6/23/2017	\$	207,102
Eaton Corporation vs. Wectec Global Project Services, Inc	6/23/2017	\$	643,658
Eaton Corporation vs. Wectec Global Project Services, Inc	6/23/2017	\$	207,102

Response 1-7

Gerdau Ameristeel US Inc. vs. Wectec Global Project Services, Inc., f/k/a CB&I Stone & Webster, Inc., f/k/a Stone & Webster, Inc.	6/23/2017	\$	575,738
LS3P Associates Ltd. vs. Tyler Construction Group, Inc.	6/28/2017	\$	-
Leidos Engineering, LLC vs. South Carolina Electric & Gas Company	6/29/2017	\$	3,266,012
May Heavy Equipment, LLC vs. South Carolina Electric & Gas	7/21/2017	\$	70,562
Atlas Copco Compressors LLC vs. South Carolina Electric & Gas Company	7/31/2017	\$	221,223
Eagle Eye Power Solutions, LLC vs. SCE&G	8/7/2017	\$	-
Acuren Inspection, Inc. vs SCE&G Company	8/15/2017	\$	202,359
Vigor Works LLC vs. South Carolina Electric & Gas Company	8/18/2017	\$	3,943,491
Ascendum Machinery Inc vs SCE&G	8/21/2017	\$	14,493
Thompson Services, Inc vs South Carolina Electric & Gas	8/23/2017	\$	335,891
BORDER STATES INDUSTRIES, INC. D/B/A SHEALY ELECTRICAL WHOLESALERS, INC. v. SOUTH CAROLINA ELECTRIC AND GAS COMPANY	8/29/2017	\$	75,176
Aecon Industrial (Aecon Construction Group)	8/30/2017	\$	4,799,746
Blanchard Machinery v SCE&G Mechanics Lien	8/31/2017	\$	496,667
Calvert Company, Inc v SCE&G	9/6/2017	\$	657,527
Mistras Group Inc vs South Carolina Electric & Gas Company	9/6/2017	\$	1,256,165
Consolidated Pipe & Supply Company vs SCE&G	9/6/2017	\$	1,008,155
Ed Waters and Sons Contracting Co., Inc. vs. SCE&G	9/6/2017	\$	1,356,338
Carboline Co vs. Cannon Sline and SCE&G	9/6/2017	\$	45,313
Herc Rentals, Inc.	9/7/2017	\$	725,155
Dennis Corporation vs. SCE&G	9/18/2017	\$	2,993
Garney Companies vs SCE&G	9/19/2017	\$	4,378,569
Garney Companies vs SCE&G	9/19/2017	\$	745,500
Wagner Industrial Electric, Inc. vs. SCE&G	9/19/2017	\$	2,633,897
Martin Marietta Materials, Inc. vs. South Carolina Electric and Gas Company	9/21/2017	\$	1,082,620
Steelfab, Inc.	9/21/2017	\$	971,112
Milton J Wood Fire Protection, Inc. vs. South Carolina Electric & Gas, for Itself and as Agent for Santee Cooper	9/22/2017	\$	1,065,074
Milton J Wood Fire Protection, Inc. vs. South Carolina Electric & Gas, for Itself and as Agent for Santee Cooper	9/22/2017	\$	93,242
Harris Acquisition III, LLC d/b/a Superior Air Handling vs. South Carolina Electric and Gas Company	9/26/2017	\$	4,588,048
Blythewood Oil Company , Inc. vs. South Carolina Electric and Gas Company	9/27/2017	\$	144,864

Response 1-7

Owen Industries, Inc dba Paxton & Vierling Steel Co vs SCE&G	10/2/2017	\$	3,128,317
Bulldog Erectors, Inc. vs. SCE&G and SC PSA	10/5/2017	\$	6,986,337
Airtool Equipment Rental Inc vs SCE&G	10/5/2017	\$	17,100
HSG Constructors, LLC, f/k/a Harsco Services Group, LLC vs. 14368 Highway 213, Jenkinsville SC	10/10/2017	\$	9,127,717
Fluor Enterprises, Inc	10/10/2017	\$	41,222,853
Envirovac Holdings, L.L.C. vs. Wectec Contractors	10/12/2017	\$	792,682
Maco, Inc. v. SCE&G and SC PSA	10/13/2017	\$	687,563
Ashmore Concrete Pumping, LLC vs. SCE&G, for itself, and as Agent for Santee Cooper	10/13/2017	\$	5,274
Holcim (US), Inc., v. SCE&G, SC PSA and Wectec Global Project Services Inc. CB&I Stone Webster	10/13/2017	\$	74,428
General Cable Industries, Inc. v. SCE&G & SC PSA	10/16/2017	\$	600,009
United Rentals (North America), Inc vs. South Carolina Electric & Gas Company	10/17/2017	\$	130,537
Consolidated Pipe & Supply Company vs SCE&G	10/17/2017	\$	522,366
Newport News Industrial Corp vs SCE&G	10/17/2017	\$	2,034,326
C.A. Murren & Sons Company vs. V.C. Summer Nuclear Facility in Jenkinsville South Carolina 29065	10/18/2017	\$	1,554,920
Bubba Tool LTD, LLC vs. South Carolina Electric & Gas Company	10/18/2017	\$	58,098
Fluor Enterprises, Inc.	10/20/2017	\$	4,050,623
UC Synergetic LLC, successor to Pike Energy v. SCE&G and SC PSA	10/20/2017	\$	3,592,445
Gerdau Ameristeel US Inc. vs. Wectec Global Project Services, Inc., f/k/a CB&I Stone & Webster,	10/23/2017	\$	161,461
System One Holdings, LLC v. SCE&G and SC PSA	10/26/2017	\$	461,895
Hartford Steam Boiler Inspection and Insurance Company vs SCE&G	10/30/2017	\$	372,559
SSM Industries, Inc. vs. SCE&G	10/30/2017	\$	1,010,162
Cives Corporation d/b/a Cives Steel Company v. SCE&G	10/30/2017	\$	178,111

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-8:

Please provide a list of contractor equipment on-site that is necessary to achieve and maintain a safe and stable abandonment status at the construction site. Please provide the monthly cost for this equipment, and the anticipated termination date for removing this equipment.

RESPONSE 1-8:

All construction equipment that is necessary to achieve and maintain a safe and stable abandonment status is being rented through local rental companies through SCE&G purchase orders as indicated in the answer to question 1-6 under Equipment Rental.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-9:

Please provide a list of contractor equipment that remains on site, and any unpaid balance associated with this equipment. If SCE&G is responsible for an unpaid balance and the owner is seeking to take possession its equipment, please provide the process that allows the equipment to be released to the owner, and the anticipated release date.

RESPONSE 1-9:

There are numerous amounts of contractor equipment that remain on-site for which an unpaid balance exists; those unpaid balances are the responsibility of Westinghouse and not SCE&G. With respect to the equipment on-site, SCE&G is in the process of cataloguing this equipment and is unable to provide a complete list of items at this time.

For any equipment owners who seek to take possession of their equipment SCE&G has implemented the following process. First, SCE&G locates the equipment on-site, and after the equipment is located, it is moved to a staging area. Next, the equipment owner is notified that the equipment is off-rent, if applicable, and available for pick-up. From there, the equipment owner and SCE&G schedule a time for pick-up. When the equipment is retrieved SCE&G documents the pick-up.

There are numerous amounts of Westinghouse-owned construction equipment on-site. SCE&G understands that Westinghouse is in the process of seeking approval from the bankruptcy court to move this equipment off-site.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-10:

Please provide a list of remaining SCANA/SCE&G staffing, their duties, position title, salary, and a timeline of the anticipated staff departure dates due to the abandonment.

RESPONSE 1-10:

Please see attached. Please note, however, that SCE&G objects to providing the salary information for the individual persons included on the attached response on the grounds that such information is confidential. Notwithstanding the foregoing objection, SCE&G is providing the requested salary information in aggregate form.



Response to 1-10

Unit 2/3 Employees remaining as of November 8, 2017

Job Title	Duties	Estimated Departure Date
Gen Mgr-Nuclear Plnt Construct	General Oversight	12/25/2017
Engineer-IV-SN	Permitting Support	12/31/2017
Mgr-Nuclear Licensing-Sn	COL & Permitting Support	12/18/2017
INSTRUC-NUC-TECH III	Nuclear Training Support	11/13/2017
Engineer-IV-SN	Site Abandonment Support	12/18/2017
SUPV-ENGINEERING-SN	Site Abandonment Support	11/13/2017
Engineer-Sr-SN	Site Abandonment Support	11/6/2017
Spec-Projects-Sn	Scheduling Support	12/25/2017
Engineer-IV-SN	Site Abandonment Support	11/27/2017
MGR-CONTRACT COMPLIANCE	Commercial Support	12/25/2017
Gen Mgr-Org/Dev Effectiveness	General Oversight	12/25/2017
Engineer-IV-SN	Site Abandonment Support	12/18/2017
Mgr-Nuclear Plant Construction	General Oversight	12/25/2017
Engineer-IV-SN	Procurement Support	1/22/2018
Spec-Chemistry	Offsite Water System Support	1/22/2018
Spec-Nuclear Record & Document	Documentation Support	7/30/2018
Engineer-IV-SN	Site Abandonment Support	7/31/2018
Supv-Nuclear Construction	Site Abandonment Support	7/31/2018

Total Salary through Anticipated Departure Date (inc./ PB&Ts) \$ **352,790**



SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-11:

Please provide a breakdown of state and federal regulatory costs by statute or regulation required to achieve and maintain a safe and stable abandonment status at the construction site.

RESPONSE 1-11:

SCE&G is in the process of closing out all permits issued for the Project which the Company was required to obtain under state and federal law prior to its decision to abandon construction. By abandoning the Project, SCE&G does not anticipate incurring any expenses as a result of complying with federal law to achieve and maintain a safe and stable abandonment status at the construction site. SCE&G will, however, incur costs as a result of complying with state law to achieve and maintain a safe and stable abandonment status. More specifically, SCE&G will incur costs to maintain the remaining storm water basins in accordance with South Carolina law. At present, SCE&G anticipates this expense to not exceed \$10,000 annually unless significant issues arise with the storm water basins. Please also see SCE&G's Response 1-26.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-12:

Please list and identify by location all areas which have been backfilled to achieve and maintain a safe and stable abandonment status at the construction site.

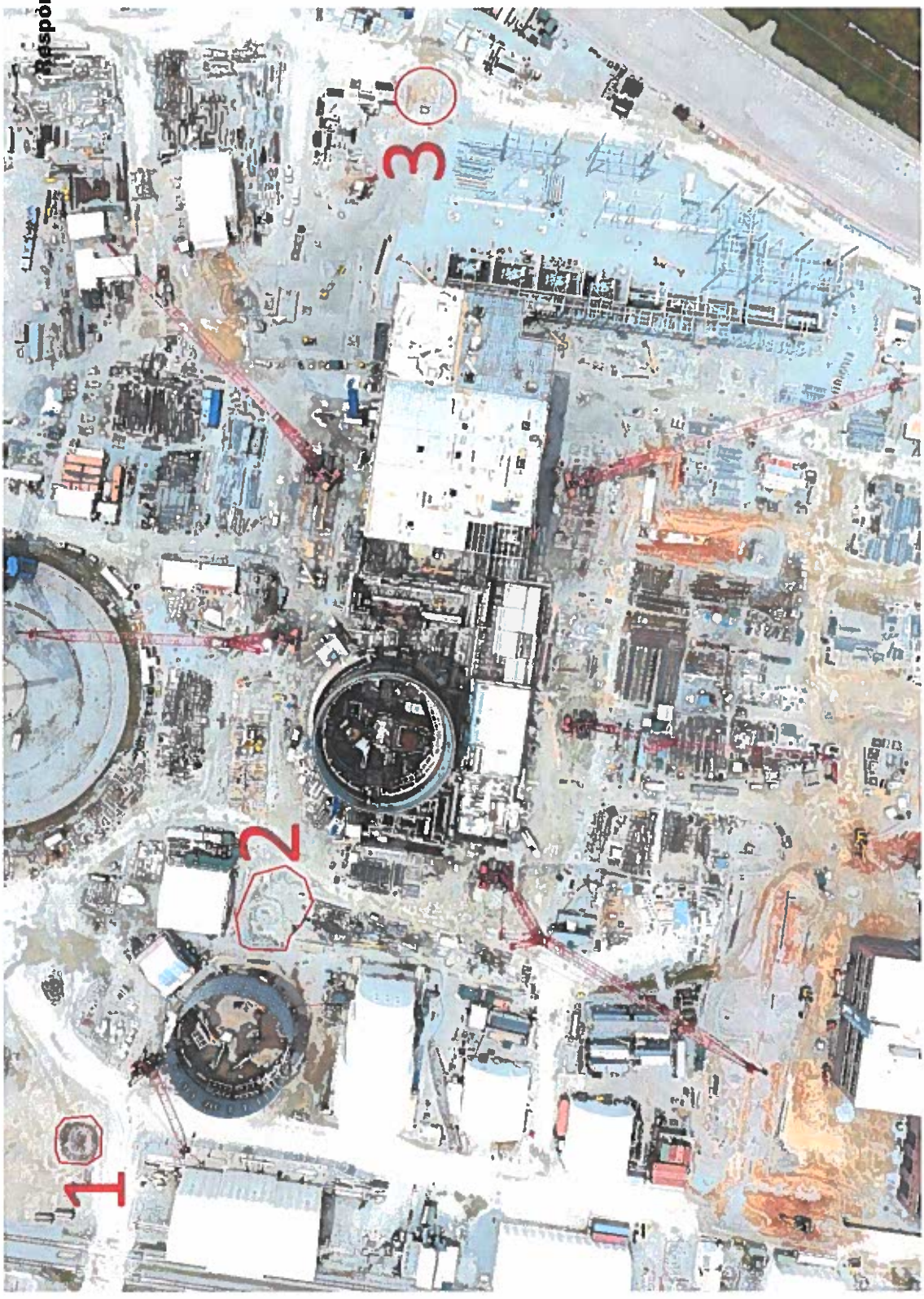
RESPONSE 1-12:

Please see attached.

Response 1



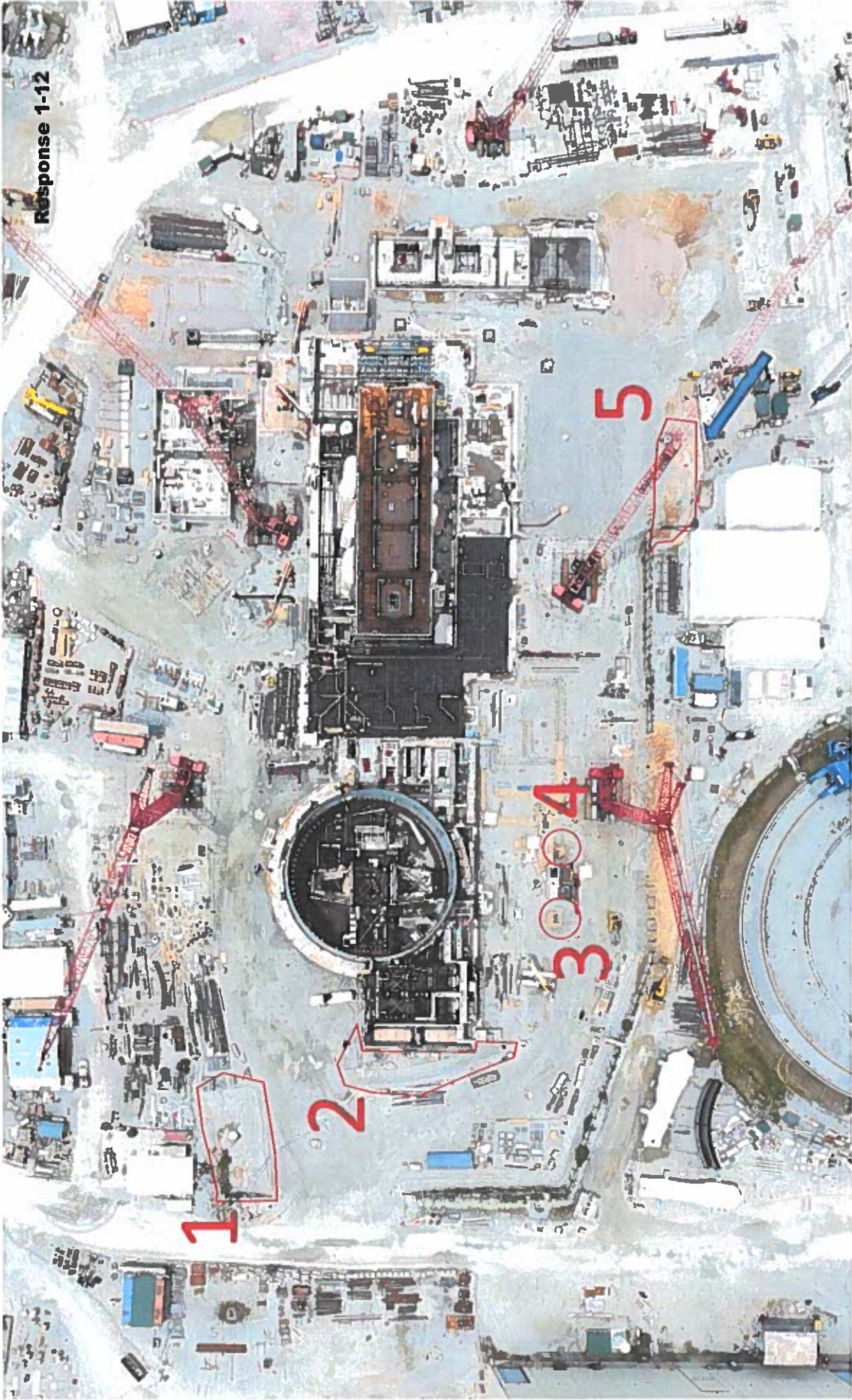
Response 1-12





Response 1-12





Response 1-12

1

2

3

4

5



Response 1-12



SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-13:

Please provide the final staffing requirements and anticipated budget for maintaining staff on-site after the Company has achieved a safe and stable abandonment status at the construction site.

RESPONSE 1-13:

SCE&G is in the process of determining its final staffing requirements. Currently, however, three individuals have been assigned to oversee Westinghouse's removal of their heavy lift derrick, batch plant, and modular assembly building. SCE&G estimates the costs for oversight and security at approximately \$30,000 a month through September 2018.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-14:

Please identify any outside resources that the Company will require to maintain the site and the remaining equipment in safe and stable abandonment status.

RESPONSE 1-14:

SCE&G has abandoned the Project, is evaluating salvage options and is not preserving the site for future use. To assist SCE&G with its evaluation of salvage options, SCE&G has retained the services of Saulsbury Industries, Inc. to maintain the current status of certain equipment at the Project on a limited basis. Additionally, SCE&G has secured the services of a security firm to provide security at the site.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-15:

Please identify and itemize all of SCE&G's costs associated with the Project prior to the Westinghouse Electric Company ("WEC") Bankruptcy, SCE&G's path to minimizing those costs and its strategy to recovery any remaining unrecovered costs.

RESPONSE 1-15:

Please see attached. With respect to SCE&G's path to minimizing those costs and its strategy to recover any remaining unrecovered costs, please see SCE&G's Petition for Abandonment filed in Docket No. 2017-244-E.

1-15 Attachment

SCE&G (\$000)

Amount spent through Q1 2017

Plant Cost Categories

Fixed with No Adjustment	\$	1,466,522
Firm with Fixed Adjustment @ 5.2%	\$	266,750
Firm with Fixed Adjustment @ 6.5%	\$	238,868
Firm with Indexed Adjustment	\$	873,741
Actual Craft Wages	\$	133,306
Non-Labor Costs	\$	406,936
Time & Materials	\$	15,787
Owners Costs	\$	385,483
<hr/>		
Total Unescalated Project Costs	\$	3,787,392
Project Cost Escalation	\$	381,511
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Total Net Cash Flow	\$	4,168,904

Transmission Projects

Total Unescalated Project Costs	\$	248,286
Contingency	\$	-
Escalation	\$	34,196
<hr/>		
Total Net Cash Flow	\$	282,483

Total Project Cash Flow \$ **4,451,387**

AFUDC(Capitalized Interest) \$ 182,242

Gross Construction \$ **4,633,629**

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-16 and 1-17:

Please describe the Company's determination as to completing or abandoning these facilities and any future use of these facilities based on that determination.

The following structures for the Units are over 50% complete:

- a) Service Building
- b) Water Treatment Plant
- c) Colling Towers
- d) Simulator equipment and training programs
- e) Switchyard
- f) Shooting Range

RESPONSE 1-16 and 1-17:

SCE&G is evaluating whether to abandon or complete the Service Building. SCE&G is abandoning the Cooling Towers. SCE&G is retaining the Water Treatment Plant, Switchyard and Shooting Range. SCE&G intends to salvage or sell the simulator equipment and training programs.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-16 and 1-17:

Please describe the Company's determination as to completing or abandoning these facilities and any future use of these facilities based on that determination.

The following structures for the Units are over 50% complete:

- a) Service Building
- b) Water Treatment Plant
- c) Colling Towers
- d) Simulator equipment and training programs
- e) Switchyard
- f) Shooting Range

RESPONSE 1-16 and 1-17:

SCE&G is evaluating whether to abandon or complete the Service Building. SCE&G is abandoning the Cooling Towers. SCE&G is retaining the Water Treatment Plant, Switchyard and Shooting Range. SCE&G intends to salvage or sell the simulator equipment and training programs.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-18:

Please provide contractor and Company staff severances, bonus payments, and contract breach costs associated with the abandonment.

RESPONSE 1-18:

The total amount for contractor and Company staff severances is \$13,142,256. With regard to bonus payments, the Company has not yet decided whether any bonus payments will be made. As for contract breach costs, exclusive of any mechanic's liens, SCE&G has not incurred any such costs as of November 8, 2017.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-19:

Please identify the equipment/components that require an inert gas purge or blanket and the actions being taken to ensure the appropriate storage requirements are maintained.

RESPONSE 1-19:

Please see attached. Moreover, SCE&G has retained the services of Saulsbury Industries, Inc. to ensure the appropriate storage requirements are maintained. SCE&G is in the process of coordinating with Saulsbury Industries, Inc. to identify the precise actions to be taken.

EPCR Parent Objectno	EPCR Parent Objectdes	Description
VS2-RCS-MV-02	Pressurizer	MV20 Weekly Nitrogen Check
VS3-RCS-MV-02	Pressurizer	MV20 Weekly Nitrogen Check
VS3-RCS-MB-02	Steam Generator 2	MB01 Steam Generator Nitrogen Check
VS3-RCS-MB-01	Steam Generator 1	MB01 Steam Generator Nitrogen Check
VS3-BDS-ME-01A	HX A	Nitrogen blanket
VS3-BDS-ME-01B	HX B	Nitrogen blanket
VS3-ZOS-MT-03B	DG B Cooling Water Exp Tank	MS40 Diesel Generator Unit - Nitrogen Blanket
VS2-ZOS-MT-03A	DG A Cooling Water Exp Tank	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-ZOS-MT-03A	DG A Cooling Water Exp Tank	MS40 Diesel Generator Unit - Nitrogen Blanket
VS2-ZOS-MT-03B	DG B Cooling Water Exp Tank	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-ZOS-ME-01A	DG A Fuel Oil Cooler	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-ZOS-ME-01B	DG B Fuel Oil Cooler	MS40 Diesel Generator Unit - Nitrogen Blanket
VS2-ZOS-ME-01A	DG A Fuel Oil Cooler	MS40 Diesel Generator Unit - Nitrogen Blanket
VS2-ZOS-ME-01B	DG B Fuel Oil Cooler	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-RNS-ME-01A	RNS HX A	ME1C Heat Exchagers - Storage Condition / Nitrogen Check
VS2-RNS-ME-01B	RNS HX B	ME1C Heat Exchagers - Storage Condition / Nitrogen Check
VS3-RNS-ME-01B	RNS HX B	ME1C Heat Exchagers - Storage Condition / Nitrogen Check
VS2-RNS-ME-01A	RNS HX A	ME1C Heat Exchagers - Storage Condition / Nitrogen Check
VS3-GSS-ME-01	Gland Steam Condenser	Toshiba Tanks Nitrogen and storage check
VS3-MSS-ME-01A	Moisture Separator Reheater A	Toshiba Tanks Nitrogen and storage check
VS3-MSS-ME-01B	Moisture Separator Reheater B	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-07A	Drain Cooler A	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-04A	LP Drain Tank A	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-04B	LP Drain Tank B	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-04C	LP Drain Tank C	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-03A	MSR A 1st Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-03B	MSR B 1st Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-01A	MSR A 2nd Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-01B	MSR B 2nd Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-02A	MSR A Shell Drain Tank	Toshiba Tanks Nitrogen and storage check
VS3-HDS-MT-02B	MSR B Shell Drain Tank	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-07B	Drain Cooler B	Toshiba Tanks Nitrogen and storage check
VS2-HDS-MT-03B	MSR B 1st Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS2-HDS-MT-03A	MSR A 1st Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS2-HDS-MT-01B	MSR B 2nd Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS2-HDS-MT-01A	MSR A 2nd Stage RHDT	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-03B	Feedwater Heater 3B	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-04A	Feedwater Heater 4A	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-01A	Feedwater Heater 1A	Toshiba Tanks Nitrogen and storage check
VS3-FWS-ME-06B	Feedwater Heater 6B	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-02B	Feedwater Heater 2B	Toshiba Tanks Nitrogen and storage check
VS3-FWS-ME-07B	Feedwater Heater 7B	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-03A	Feedwater Heater 3A	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-01B	Feedwater Heater 1B	Toshiba Tanks Nitrogen and storage check
VS3-FWS-ME-07A	Feedwater Heater 7A	Toshiba Tanks Nitrogen and storage check
VS3-FWS-ME-06A	Feedwater Heater 6A	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-04B	Feedwater Heater 4B	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-01C	Feedwater Heater 1C	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-02C	Feedwater Heater 2C	Toshiba Tanks Nitrogen and storage check
VS3-CDS-ME-07C	Drain Cooler C	Toshiba Tanks Nitrogen and storage check
VS3-VYS-ME-01B	Heat Exchanger B	ME2L Heat EXchangers Nitrogen Check
VS3-VYS-ME-01A	Heat Exchanger A	ME2L Heat EXchangers Nitrogen Check
VS2-PXS-ME-01	PRHR HX	ME02 PRHR-HX Condition and Nitrogen Check
VS2-RCS-MV01-RVCH	REACTOR VESSEL CLOSURE HE/	MV01 (RVCH) Nitrogen check
VS3-RCS-MV01-RVCH	REACTOR VESSEL CLOSURE HE/	MV01 (RVCH) Nitrogen check
VS2-ZOS-MS-04A	DG A Radiator Package	MS40 Diesel Generator Unit - Nitrogen Blanket
VS2-ZOS-MS-04B	DG B Radiator Package	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-HSS-MS-01	H2 Seal Oil Package	MS38 Hydrogen Seal Oil Unit (SOU) - Condition and Nitrogen Maintenance

VS3-VWS-MS-01A	High Cap Chiller 1A	MS01 Water-Cooled Chillers - Condition and Nitrogen Check
VS3-VWS-MS-01B	High Cap Chiller 1B	MS01 Water-Cooled Chillers - Condition and Nitrogen Check
VS3-ZOS-MS-04A	DG A Radiator Package	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-ZOS-MS-04B	DG B Radiator Package	MS40 Diesel Generator Unit - Nitrogen Blanket
VS3-ZVS-ET-10	Excitation Transformer	ET05 Nitrogen Check
VS2-ZVS-ET-10	Excitation Transformer	ET05 Nitrogen Check
VS3-ZAS-ET-2A	Unit Auxiliary Transformer 2A	ET02 (UAT) UNIT AUX TRANSFORMER- NITROGEN FILL
VS2-ZAS-ET-2A	Unit Auxiliary Transformer 2A	ET02 (UAT) UNIT AUX TRANSFORMER- (VS2) NITROGEN FILL
VS2-DAS-EY-P03Z	DAS Elec Ctmt Pen	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P01X	Ctmt Elec Pen P01	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P02X	Ctmt Elec Pen P02	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P06Y	Ctmt Elec Pen P06	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P07X	Ctmt Elec Pen P07	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P09W	Ctmt Elec Pen P09	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P10W	Ctmt Elec Pen P10	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P17X	Ctmt Elec Pen P17	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P18X	Ctmt Elec Pen P18	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P19Z	Ctmt Elec Pen P19	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P20Z	Ctmt Elec Pen P20	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P22X	Ctmt Elec Pen P22	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P23X	Ctmt Elec Pen P23	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P24	Spare Elec Pen	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P25W	Ctmt Elec Pen P25	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-ECS-EY-P26W	Ctmt Elec Pen P26	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSA-EY-P12Y	Ctmt Elec Pen P12	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSA-EY-P13Y	Ctmt Elec Pen P13	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSB-EY-P31Y	Ctmt Elec Pen P31	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSB-EY-P32Y	Ctmt Elec Pen P32	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSC-EY-P28Y	Ctmt Elec Pen P28	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSC-EY-P29Y	Ctmt Elec Pen P29	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSD-EY-P15Y	Ctmt Elec Pen P15	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check
VS2-IDSD-EY-P16Y	Ctmt Elec Pen P16	EY01 Electrical Penetration Assembly (EPA) Nitrogen Pressure Check

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-20:

Please discuss SCE&G's decision to either maintain, suspend or terminate its combined operating license ("COL"). Also provide the date this decision must be formally conveyed to Nuclear Regulatory Commission. ("NRC")

RESPONSE 1-20:

SCE&G anticipates terminating the COL no later than December 15, 2017. By letter dated October 27, 2017, SCE&G informed the NRC that the Company will submit a disposition plan for the COL by December 15, 2017.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
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REQUEST 1-21:

Please describe any additional NRC requirements and actions the Company must take if it elects to maintain, suspend or terminate its COL license and a timeline for such action.

RESPONSE 1-21:

The NRC Policy Statement on cessation of construction allows for a declaration of deferral or termination of the project. Actions related to termination (abandonment) of the project and withdrawal of the COLs is set forth in SCE&G's response to Audit Request 1-22 and are scheduled to be accomplished by December 15, 2017, the current due date for informing the NRC of our plans for COL disposition.

Placing the project in a deferred (suspended) status allows for maintenance of the COLs and requires numerous additional actions including: revision of the QA Plan to reflect expected site activities, implementation of a Maintenance and Preservation Plan for critical equipment, retention of quality records, and ongoing compliance with applicable regulations (e.g. corrective action program (CAP), fitness for duty program, etc.) and the COL reporting requirements. New NRC regulations would need to be addressed. These activities are required for the duration of the deferral period until the project is terminated or reactivated. Further, the NRC will continue to conduct inspections of site activities and key programs (e.g. QA Plan, CAP) during the deferral period.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-22:

Provide a list of documents that have been provided and will need to be provided to the NRC as a result of SCE&G's announcement of its intention to abandon the Units.

RESPONSE 1-22:

By letter dated August 17, 2017, (NND-17-0464) SCE&G notified the NRC of termination of construction activities and committed to provide a plan for COL disposition within 90 days. By letter dated October 27, 2017, (NND-17-0513), SCE&G extended its submittal date for its COL plan to December 15, 2017.

As part of complete abandonment of the project, a COL withdrawal request must be sent to the NRC. The request would include the status of the site, a site redress plan, and a request to withdraw any License Amendments, Exemptions, Code Alternative requests under NRC review and all ITAAC Closure Notices.

Until the NRC withdraws the COLs, routine reports (noting construction termination status) will continue to be submitted to the NRC for the following:

- a. ITAAC Schedule Updates (every 6 months)
- b. Operational Program Schedule Updates (every 6 months)
- c. Departures Reports (6 months)
- d. FSAR Update (annually)
- e. Fukushima Response Status Reports (every 6 months)
- f. 50.46 Updates (annually)
- g. Transfer responsibility for radioactive source oversight to Unit 1 (completed NND-17-0494)

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-23:

ORS understands the NRC requires a written plan of abandonment as a result of SCE&G's intentions to abandon the Units. Please provide that written plan upon completion.

RESPONSE 1-23:

SCE&G's Response 1-22 sets forth the steps for abandonment concerning the COL. The plan for abandonment required by the NRC has not yet been completed, but it will be provided upon completion.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-24:

Please discuss the required records needed to maintain the COL license.

RESPONSE 1-24:

Records required by 10 CFR 50 Appendix B and the QA Plan should be maintained while the COL remains active. With the cessation of construction, the QA Plan does not need to be as extensive and can be revised to reflect anticipated activities. In this case, records associated with preventative maintenance should be maintained. If critical equipment is to be sold, then records associated with procurement, fabrication/installation, and preventative maintenance of that equipment should be maintained.

In addition, records associated with correspondence with the NRC and other regulatory agencies will be maintained and any other required program records (e.g. corrective action program, fitness for duty program).

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-25:

Please provide the current status of Inspections, Tests, Analyses, and Acceptance Criteria ("ITAAC") for the Units, a list of completed ITAACs and the steps SCE&G is taking to preserve the ITAAC database.

RESPONSE 1-25:

The following link provides a listing and status by the NRC for all Unit 2 & 3 ITAAC (scroll to the bottom of the page where ICN Review Status is listed by plant).

<https://www.nrc.gov/reactors/new-reactors/oversight/itaac.html>

Summary of Current Status:

- 873 ITAAC Closure Notifications (ICN's) per Unit
- ICN's submitted to date – 112
- Unit 2 ICN's submitted: 57
- Unit 3 ICN's submitted: 55

SCE&G does not currently have access to the WEC Smartplant (ITAAC) database.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-26:

Please identify what state or federal permits are necessary to achieve and maintain a safe and stable abandonment status at the construction site. Also, discuss what actions the Company is taking to meet those permit requirements.

RESPONSE 1-26:

Please see SCE&G's Response 1-11.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-27:

Please discuss the status of transferring the American Society of Mechanical Engineers qualifications from WEC to SCE&G.

RESPONSE 1-27:

The American Society of Mechanical Engineers (ASME) Certificate Holders are Westinghouse, Carolina Energy Solutions, WECTEC, and CBI Services (collectively, Existing Certificate Holders). By letter dated August 17, 2017, a copy of which is attached to this response, SCE&G requested that Westinghouse provide SCE&G with assistance in transferring the ASME Certificate Holder responsibilities to SCE&G. In order to transfer the ASME Certificate Holder responsibilities to SCE&G, the parties referenced above, including SCE&G, must enter into a Memorandum of Understanding (MOU). The MOU will serve to preserve the ASME Section III work performed for VC Summer Units 2 and 3 by documenting completed work utilizing guidance from ASME Section III Code, Appendix Z. The MOU will also document the status of the code activities and acceptance of transfer responsibilities. The MOU must be approved by the Existing Certificate Holders as well as their Authorized Nuclear Inspector. The MOU must also be approved by the Owner and the jurisdictional authority, namely, the NRC at the construction site.

Westinghouse has not officially responded to SCE&G's request that would aid in development of an MOU and subsequent transfer of responsibilities; however, Westinghouse and SCE&G have had numerous discussions concerning the cost of securing an MOU but have not yet reached a commercial agreement on this matter.



August 17, 2017

NND-17-0466

Mr. Carl Churchman
Westinghouse Electric Company
Nuclear Power Plants
1000 Westinghouse Drive, Suite 112
Cranberry Township, PA 16066

Subject: ASME III Completion and Preservation

- Reference:
- (1) Engineering, Procurement, and Construction Agreement for AP1000 Nuclear Power Plants, dated May 23, 2008 – V.C. Summer Units 2 and 3, as Amended ("Agreement")
 - (2) October 2015 Amendment, dated October 27, 2015
 - (3) Interim Assessment Agreement, effective March 28, 2017
 - (4) Interim Assessment Agreement, Amendment No. 1, effective April 28, 2017
 - (5) Interim Assessment Agreement, Amendment No. 2, effective June 26, 2017
 - (6) ASME Boiler and Pressure Vessel Code, Section III, Appendix Z, 1988 with 1989 Addenda

Action: Westinghouse to transfer ASME Certificate Holder responsibilities to Owner and provide Owner with all requested ASME information by August 23, 2017.

Dear Mr. Churchman:

SCE&G requests the transfer of ASME Certificate Holder responsibilities to SCE&G via a Memorandum of Understanding to preserve the ASME Section III work performed for VC Summer Units 2 and 3 by documenting completed work utilizing guidance from ASME Section III Code, Appendix Z (reference 6).

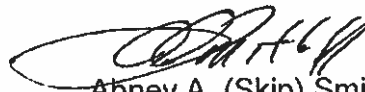
Reference 6 requires that a Memorandum of Understanding shall be approved by all parties involved, which documents the status of the code activities and acceptance of transfer responsibilities. The Memorandum of Understanding must be approved by the existing certificate holder and their Authorized Nuclear Inspector (ANI). When work is performed on a Nuclear construction site, the Memorandum of understanding must also be approved by the Owner and the Jurisdictional authority (NRC) with Jurisdiction at the construction site.

SCE&G requests the following information from the ASME Certificate Holders (Westinghouse, Carolina Energy Solutions, WECTEC and CBI Services) to support the creation of a Memorandum of Understanding:

1. Provide a list of all ASME material on site, or to be delivered that SCE&G has paid for.
2. Provide a list of ASME Section III work scope completed (open and closed work packages/travelers).
3. Provide the point of completion that would be required by the Certificate Holders ASME Program.
4. Provide a written estimate including a resource loaded schedule which would be required to complete each activity below:
 - Certification of installed ASME III systems and transfer of systems to SCE&G.
 - Certification of uninstalled ASME III components and loose material and transfer of items to SCE&G.

SCE&G requests this information to be returned no later than August 23, 2017. Please let me know if you have any further questions.

Sincerely,



Abney A. (Skip) Smith
Manager
Business & Financial Services

AAS/cw

NND-17-0466
August 17, 2017
Page 3 of 3

cc: Ronald A. Jones – SCE&G
Abney A. Smith – SCE&G
Alan D. Torres – SCE&G
Kyle Young – SCE&G
Robert B. Stokes – SCE&G
April Rice – SCE&G
Kevin Kochems – SCE&G
Judy Wasieczko – SCE&G
Michael Verrilli – SCE&G
Todd Johnson – SCE&G
Guy Bradley – SCE&G
Kyle Nash – SCE&G
Al Bynum – SCE&G
Ryder Thompson – SCE&G
Keith Savastano – SCE&G
Marion Cherry – Santee Cooper
Carl Churchman – Westinghouse
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SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-28:

Please provide a list of all equipment that has been sold or disposed of since the abandonment decision and the reason for the action.

RESPONSE 1-28:

As of November 8, 2017, SCE&G has not sold or disposed of any equipment since the abandonment decision.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-29:

Please provide a list of remaining equipment deliveries and the cost of each item.

RESPONSE 1-29:

SCE&G is not in possession of a complete list of remaining equipment deliveries including the cost of each item. Notwithstanding the foregoing, attached to this response is a partial list of open purchase orders that Westinghouse has not rejected in its Bankruptcy proceeding.

Description	PO Commitments		
	VCS Unit 2 Shipped	VCS Unit 3 Shipped	Total Committed
Tube, Fuel Transfer, 3D in ID - Unit 2	partial	partial	352,575
Vlv, 3Way Sol.2", BR	partial	partial	19,184
RCP Cart - SCANA	no	no	390,062
V52, Heat Exchanger, RMS, ME1C	partial	partial	1,858,780
Buss Duct	no	no	15,237,013
Restrictor, Flow Guide Tube	yes	yes	1,125,283
VC Summer DDD01 Cabinets	yes	yes	2,800
V52 DCIS CABINETS TO SITE (4)	yes	N/A	3,310
Welded Hoop Ties at Wall 11	N/A	no	135,519
Fabricated Structural Steel Materials	N/A	partial	150,724
Shop Fabricated ASME III Piping	partial	N/A	Post Filling PD
Shop Fabricated ASME B31.1 Piping	partial	partial	10,085,434
Shop Fabricated ASME B31.1 Piping	partial	N/A	5,661,256
Pipe Sleeves	N/A	partial	7,432
Fabrication of R365 Module	N/A	no	214,443
Equipment Module Piping	partial	partial	4,202
CWS, RWS and WWS Above Ground Piping	N/A	partial	100,700
Shop Fabricated ASME III Piping	N/A	partial	13,215,128
Shop Fabricated ASME III Piping	partial	N/A	9,713,645
Carbon Steel Pipe Spools	partial	N/A	97,860
Stainless Steel Pipe Spools	partial	N/A	71,001
Pipe Sleeves	partial	N/A	109,070
Pipe Spools	partial	N/A	88,742
Pipe Spools	N/A	partial	69,304
CB& LAURENS 976732 OP TRANS	N/A	N/A	1,200,000
V52 Invt Screens A & B	no	no	5,352,034
V52 CCI Field Services Support -MY03	N/A	N/A	350,000
Vlv,Glb;12"wb;CL1900,AS,A-O,BW,S-80	partial	partial	1,692,982
APP-PV59-Z00-103	partial	partial	28,200
HOT HOT Tractor T28 Welder, pipe stands, inserts, hose e	no	no	4,700
T412 WELDER - FUSION INSERT- Hoses - Cords FOR SITE LAYOU	no	no	5,550
Rental Equipment - Consolidated Pipe	no	no	50,625
ASME B31.1 Non-Safety Related Piping and Fittings (D-RTNSS)	partial	N/A	88,708
Isolation Gaskets for Dielectric Flanges	partial	N/A	15,025
Structural Steel Materials	partial	N/A	11,455
Safety-Related Embed Plates and Miscellaneous Steel	N/A	no	347,217
BVlv 2" 1900SS ManOp BW 160 Cl 2 CIV LC	partial	partial	1,994,650
Vlv,Chk,1",CL1500INT,CS,Man,SKW	partial	partial	62,372
Unit 2 Annex Cable Tray Supports	partial	N/A	64,727
Electrical Conduit and Junction Box Supports	partial	N/A	230,008
Electrical Conduit and Junction Box Supports	N/A	partial	226,911
Seismic Category I Cable Tray Supports	no	N/A	733,594
Seismic Category I Cable Tray Supports	N/A	no	737,561
Air Handling Units	no	N/A	70,875
M510 Air Handling Units	N/A	no	118,301
FT01-V2-531-ASY	partial	partial	18,000
			223,974
			11,517
			390,062
			1,858,778
			280,149
			1,125,283
			1,783
			3,099
			107,518
			91,474
			8,545
			300,578
			-
			214,443
			4,202
			-
			100,700
			12,797,407
			8,668,006
			-
			97,860
			71,001
			108,032
			88,742
			69,304
			-
			1,200,000
			5,342,034
			189,776
			1,686,981
			28,200
			2,883
			5,350
			200
			12,286
			4,452
			13,482
			1,543
			1,356
			89,894
			96,425
			62,372
			-
			3,357
			82,009
			106,482
			5
			3,970
			2,550
			49,976
			9,000

PSV/4" 1500 120S BW CI 1 N-Act	partial	partial	718,708	678,852	39,856
FwChViv 20" 800	partial	partial	461,243	322,165	139,078
Mechanical Splices Blanket Purchase Agreement Release #1	partial	N/A	662,443	491,653	170,790
Blanket Purchase Agreement Release #3	no	N/A	173,158	172,950	208
VC Summer EHX Installation tool for RCP	no	no	23,750	23,750	-
Tool-X-Brace Lifting Fuel Rack Install	no	no	357,427	339,556	17,871
V52 Design, Mfg., & Documentation Cost	partial	partial	1,248,312	1,248,312	-
EF5 ESSOW	N/A	N/A	8,011,932	4,399,680	3,612,252
Emergency Preparedness Communication Systems (EFS) Integr	no	N/A	147,068	141,997	5,072
U-Bolts and Pipe Straps	partial	partial	2,107	1,912	195
Unit 3 Turbine Building Foundation SIP Forms	N/A	yes	239,635	196,711	42,924
Parts and Service for Company Owned Equip.	N/A	N/A	19,182	19,182	-
MH40 Hoists and Trolleys	No	No	48,180	46,872	1,308
MH40 Hoists and Trolleys	No	No	47,505	46,872	633
Penetration Assy.Elec.Non-IE,I&C, P03	partial	no	9,139,418	7,481,905	1,657,513
PV39-ZOD-103	partial	partial	150,949	150,949	-
PV39-ZOD-103	N/A	no	150,949	150,949	-
V52 High Pressure Filters	partial	partial	387,976	381,496	6,480
Viv,AuxRel;2"x3" CL150,SS,S-A,FI	partial	partial	98,257	98,380	(123)
Vacuum Breaker Vvvs,1",CL1600,SS7,FI	partial	partial	251,608	251,608	-
RVL/R,Complete - Vogtle #3	N/A	partial	4,501,715	2,303,215	2,198,500
Technical and Quality Requirements	N/A	N/A	2,232,620	2,232,620	-
Gate Assy,Well,Fuel Pool,Trans Canal	no	no	2,052,765	1,266,476	786,289
V52 Design, Mfg., & Documentation Cost	partial	partial	811,970	452,320	359,650
V52 Design, Mfg., & Documentation Cost	partial	partial	374,452	264,404	110,048
Viv,G;3;11500INT,SS,Man,BW,S-XXS	yes	no	4,007,363	3,158,308	849,055
Viv,Glib;2",CL300,AS,M-O	partial	partial	899,254	797,964	101,291
Penetration,Bellows Exp Joint,SGS,P23	yes	no	1,050,740	988,548	62,192
Non-Safety Related Dampers	no	N/A	599,331	363,815	235,516
Viv,Ndl;1",CL1500INT,SS,Man,BW	partial	partial	16,380	16,380	-
VC Summer Unit 2 Iso Phase Bus Duct MPA-E030-00	no	N/A	351,999	-	351,999
VC Summer Unit 3 Non Seg Phase Bus Duct MPA-E031-00	N/A	no	1,443,565	-	1,443,565
VC Summer Unit 3 Iso Phase Bus Duct MPA-E030-00	N/A	no	1,287,169	30,000	1,257,169
VC Summer Unit 2 Non Seg Phase Bus Duct MPA-E031-00	no	N/A	363,554	-	363,554
Blanket Order for ASME B31.1 Non-Safety Related Piping and F	no	no	2,825	2,700	125
MN20 DESIGN VC SUMMER UNIT 2	yes	no	5,932,239	3,698,318	2,233,921
RCP Stud Installation Tool - VC Summer	partial	partial	96,955	96,955	-
Select CH Modules Fabrication	N/A	no	848,635	721,150	127,485
Air-operated, double diaphragm pump	partial	partial	227,906	220,806	7,100
JED2 Press / Diff. Press Transmitters	partial	partial	1,316,380	695,276	621,104
Viv,Ck;3"CL1500INT,SS,A-O,BW,S-160	no	no	409,692	407,500	2,192

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-30:

Please provide the results of the most recent equipment inventory and plant walk-down.

RESPONSE 1-30:

SCE&G has instituted reoccurring walk-downs of the warehouses, tents, and laydown yards. The most recent walk-down revealed that the condition of the warehouses (on-site and off-site) meet ANSI level B storage requirements. Also, the ANSI level A storage in warehouse 20A continues to meet level A storage requirements (temperature and humidity). All of the equipment in warehouses and tents is in good condition. SCE&G has not performed a walk-down with respect to installed equipment.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-31:

Please describe the actions SCE&G has taken to ensure the property preservation of equipment and component remaining on site.

RESPONSE 1-31:

Please see SCE&G's Response 1-2.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-32:

Please discuss the Company's quality assurance program with regard to demobilization activities.

RESPONSE 1-32:

The VC Summer Units 2/3 Combined Operating License currently remains in effect even though SCE&G has ceased construction. As such, 10 CFR 50 Appendix B Quality Assurance Program Criteria requirements remain applicable to activities that may affect safety related systems, structures and components as described in the Quality Assurance Program Description ("QAPD"). During site demobilization to prepare for abandonment, there are no work activities currently being performed that could adversely affect Safety Related System Structures and Components and fall under the purview of the Unit 2/3 QAPD.

Should activities be required under Appendix B and the Unit 2/3 QAPD prior to license withdrawal, measures remain in place to assure compliance. Upon determination of ownership for certain Unit 2/3 components, inventory control and preventive maintenance for these components will be transferred and performed under the Unit-1 QA Program.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-33:

Please provide the status of the training simulators for the Units and the associated training materials. Also, discuss the Company's decision regarding the simulator (e.g., retain salvage).

RESPONSE 1-33:

The training simulators for the Units have been de-energized and are no longer in use. The associated training materials (currently BL7) are obsolete. Westinghouse has expressed interest in the VISION database (SAT task-to-training materials database). SCE&G's plan is to salvage or sell the simulators.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-34:

Please provide a categorized list of all unpaid invoices to include the dollar amount associated with each invoice.

RESPONSE 1-34:

Please see attached.

Name	Amount
ALLIED SPECIALTY RESOURCES LLC	\$ 27,561.76
BLYTHEWOOD OIL CO INC	\$ 8,720.55
BULLDOG ERECTORS INC	\$ 636,732.68
BUNNELL-LAMMONS ENGINEERING INC	\$ 42,619.20
COMMUNICATION MANAGEMENT INC	\$ 4,404.39
DOCUMENT SOLUTIONS INC	\$ 39,534.99
FLUOR ENTERPRISES INC	\$ 1,810,753.33
GUTOR ELECTRONICS LLC	\$ 98,450.00
HERC RENTALS INC	\$ 64,189.59
JENSEN HUGHES INC	\$ 36,904.45
M B KAHN CONSTRUCTION CO INC	\$ 627,600.00
REED SMITH LLP	\$ 254,760.42
SANTEE COOPER	\$ 48,644.60
SIMPLEXGRINNELL	\$ 1,104.10
SYSTEM ONE HOLDINGS LLC	\$ 7,318.80
US NUCLEAR REGULATORY COMMISSION	\$ 530,237.18
WESTINGHOUSE ELECTRIC COMPANY LLC	\$ 483,367.19
TOTAL	\$ 4,722,903.23

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-35:

Please provide a list of any and all items that have been salvaged and the dollar amount received from each salvaged item.

RESPONSE 1-35:

As of November 8, 2017, SCE&G has not salvaged any items.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-36:

Please provide a list of any and all items anticipated to be salvaged and the estimated dollar amount to be received from each salvaged item.

RESPONSE 1-36:

All equipment owned by SCE&G at the site is available for salvage. SCE&G has not yet projected a dollar amount that it could receive from each salvaged item.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-37:

Please discuss the level and processes in place to ensure adequate security for the site.

RESPONSE 1-37:

SCE&G has engaged the services of Allied Universal to ensure adequate security for the site. Due to the sensitive nature of the services provided and in responding to this request, SCE&G will not detail the level and processes it has in place for security at the site.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-38:

Please identify and list all equipment and buildings associated with the Units that will be supporting V.C. Summer Unit 1 after the abandonment.

RESPONSE 1-38:

SCE&G is in the process of evaluating which equipment and buildings can support V.C. Summer Unit 1. Please also see SCE&G Response 1-16.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-39:

Please provide an estimated cost to preserve the site for future restart (within 2 years, 5 years and 10 years).

RESPONSE 1-39:

SCE&G has abandoned the Project, is evaluating salvage options and is not preserving the site for future restart.

In the event, however, that another party seeks to preserve the site for future restart, a third-party consultant has estimated that a 2-year site preservation would cost approximately \$800 million; a 5-year delay would cost approximately \$2 billion; and a 10-year delay would cost approximately \$4.1 billion. These amounts are 100% numbers and reflect the maintenance of the appropriate and necessary level of staffing to restart construction.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-40:

Please provide a copy of the process to be used by WEC and SCE&G to determine ownership of equipment and components related to the Units.

RESPONSE 1-40:

The process used to determine ownership of equipment between the Consortium and the Owners is not resolved. The Consortium has taken the position that, under section 21.1 of the EPC Agreement, until a particular piece of equipment is paid for "in full," title remains with the Consortium. The Consortium further contends that under the fixed price arrangement, payments are allocated to all equipment, so that none has been paid in full until all payments under the contract have been made. The Owners dispute this position. The parties, however, have made efforts to resolve this dispute and those efforts are ongoing. Presumably, any position agreed to by Westinghouse is subject to the approval of the Bankruptcy Court.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-41:

Please provide a comprehensive list of major equipment and components by owner (WEC or SCE&G) related to the Units.

RESPONSE 1-41:

Please see SCE&G Response 1-40.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-42:

Please provide any agreements/contracts between SCE&G and salvage vendors.

RESPONSE 1-42:

SCE&G has not entered into any agreements/contracts with salvage vendors. Accordingly, SCE&G is not in possession of any documents responsive to this request.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
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SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

REQUEST 1-43:

Provide all written documents detailing the cost of abandoning versus preserving or "mothballing" the site.

RESPONSE 1-43:

Please see attached. Please note that SCE&G is currently conducting an extensive collection and review of its own documents and is continuing to review whether there are any additional documents responsive to this request, as well as whether there are any existing confidentiality agreements or privilege issues that would be implicated by production of other documents. SCE&G states that it will supplement its production, to the extent any additional responsive documents are found, to produce any additional responsive and non-privileged, non-work product documents in its possession.

FIRST SUPPLEMENTAL RESPONSE 1-43:

SCE&G has located an additional document responsive to this request which consists of a document prepared by AECOM ("AECOM Document"). The AECOM Document, however, contains highly confidential and sensitive information. Due to the highly confidential and sensitive nature of the information contained within the AECOM Document, the Company will make the AECOM Document responsive to this request available for review and inspection at the SCE&G headquarters. You may contact SCE&G's counsel, Chad Burgess, at 217-8141, to schedule a time to view this document.

SOUTH CAROLINA ELECTRIC & GAS COMPANY
OFFICE OF REGULATORY STAFF'S FIRST AUDIT INFORMATION REQUEST
SCE&G Activities and Events Related to the Intention to Abandon V.C. Summer
for Units 2 & 3 site in Jenkinsville, SC

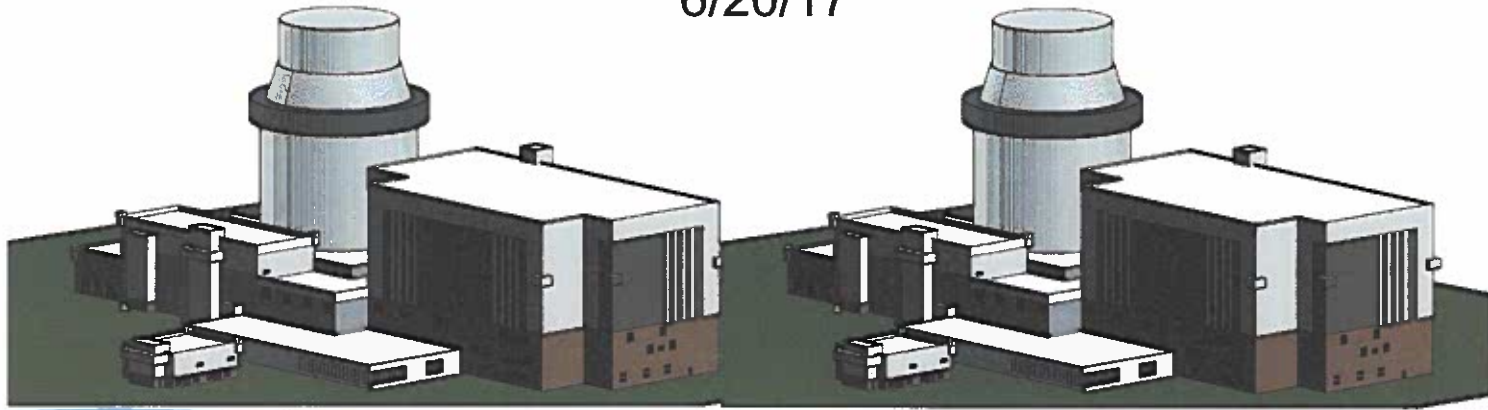
REQUEST 1-43:

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RESPONSE 1-43:

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V.C. Summer Units 2 & 3
Estimate To Complete Overview
6/20/17



Today's Agenda

- Introductions
- Estimate To Complete (ETC) Presentation
- Documents in E-room
- Approach to Prospective Q&A
- E-room access (tokens)
- Lunch
- Login to E-room

Byron Hinson
Kyle Young
Alan Torres
Kevin Kochems
Kyle Young
Byron Hinson
William Hutson

NOB Cafe
ORS NND Offices
William Hutson

ETC Overview Agenda

- WEC ETC Information
- ETC Baselines
- ETC Validation Process
 - Quantity Validation
 - Unit Rates
- Schedule Model
- Cost Model
- Baseline Schedule for ETC cost pricing

ETC Overview Agenda

- Significant Process Improvements
- Overall Cost Summary – 2-Unit ETC
 - Non-Construction Phases
 - Construction Phases
 - Direct Construction, Indirect Construction, Field Non-Manual
 - Subcontracts
 - Distributables, Equipment/Other
 - Other Project-related costs
- Owner's Cost
- Overall Cost Summary – 1-Unit ETC
- Open Items
- Process to Finalize ETC

ETC Overview

Westinghouse
ETC Information

**EAC & ETC for V.C. Summer AP1000 Project (Actuals reflect WEC spending
 (from inception to Feb. 2017) + WECTEC spending (Jan 2016 - Feb 2017))**

	Actuals (thru 2/2017) \$Mils	ETC (from 3/2017) \$Mils	EAC \$Mils
Non-Construction			
• Procurement - Equipment & Bulk/Raw Materials	\$ 2,091	\$ 863	\$ 2,954
• Engineering (Labor)	449	73	522
• Instrumentation & Controls	254	79	332
• Commissioning	65	189	254
• Procurement-related (Labor)	201	77	278
• Project Management	69	47	116
• Provisional Cost for impact of schedule extension	-	50	50
• All Other Non-Constr. (incl. Qual/EHS, Licensing, Proj. Services)	94	95	189
Subtotal	\$ 3,223	\$ 1,472	\$ 4,696
Construction			
• Construction - Fluor (Direct Craft, Indirect Craft, Field Non-Manual)	\$ 547	\$ 2,270	\$ 2,817
• Construction Direct & Indirect Subcontracts	282	751	1,033
• Construction - Distributables, Equipment/Other	131	281	412
• All Other (incl. WEC Construction, WECTEC Professional Services)	109	211	320
Subtotal	\$ 1,069	\$ 3,513	\$ 4,582
Other Project-related Costs			
• Escalation	\$ -	\$ 247	\$ 247
• Mgmt Reserves (Risk Register, LDs, "Unknown Unknown" contingency)	-	554	554
• Warranty	-	62	62
• Historical Costs (including Design Finalization)	42	-	42
• All Other	21	130	151
Subtotal	\$ 63	\$ 993	\$ 1,056
LESS: AP not yet paid as of 2/28/17 (estimate)	(141)	141	-
TOTAL	\$ 4,214	\$ 6,119	\$ 10,333

WEC Pre-Bankruptcy ETC



WEC ETC

- WEC began ETC efforts in March 2016
- Price Waterhouse Coopers independently audited, not complete
- Constrained to April 2020 and December 2020 schedule
- Schedule never finalized
- Non-Construction
 - Went through 3 major reviews and subsequent cuts
- Construction
 - WEC provided engineered quantities, applied 1x4 learnings factor
 - Fluor provided Unit Rates, wages, per diem rates, ratios, staffing plan in Basis of Estimate (multiple revisions)

ETC Baselines

- WEC ETC contained varying baseline dates depending on area
 - Some areas were progressed with actuals, others remained at 3/31/2016
- SCE&G ETC baselines are all April 2017 for the examined areas

	WEC ETC	SCE&G ETC
Quantities	12/31/2016	4/17/2017
Direct Hours	2/1/2017	4/17/2017
Subcontracts	8/1/2016	4/1/2017
Procurement	3/31/2016	4/1/2017
Substantial Completion	4/20/2020	8/20/2023

ETC Validation Process

Step 1 – Receive Information from WEC

- Started 03-Apr; Substantially completed 12-May
- Received 150+ workbooks for Non-Construction support estimate
- Received 1,000+ line items for WEC Construction estimate
- Received Fluor Basis of Estimate (a subset of WEC Construction estimate)

Step 2 – Review Information

- Started 17-Apr; Substantially completed 22-May
- Had to interview WEC ETC “Phase Leads” and WEC “Cost Accounting Managers” and reconcile differences

Step 3 – Validate Information

- Started 1-May; Substantially completed 28-May
- Unit Rates – Validated Fluor rates through independent review; some risks in electrical rates (captured in Risk Register)
- Quantities – Invalidated WEC quantities; re-estimated 35% of total quantities; added risks for remainder of quantities
- Invalidated WEC major assumptions on Subcontracts, Schedule, Risk, overhead, etc.

ETC Validation Process

Step 4 – New Owner Estimate to Complete

- Started 9-May
- Created new Level 1 Schedule Model by SCE&G, Fluor and WEC schedulers
 - Utilized independent consultant to validate Construction, Startup, and Power Ascension schedules
 - Utilized historical performance at VCS for civil and structural commodities
 - Utilized historical performance in Nuclear industry for other bulk commodities
- Created new Cost Model based on Fluor actual performance
- Created new Risk Register
- Created new staffing plan (significantly changed from WEC)
- Initial ETC based on completing both units
- Revising ETC based on completing one unit

ETC Validation – Quantities

SCE&G/Southern Nuclear % of Quantities Sampled
(in terms of direct man-hours)

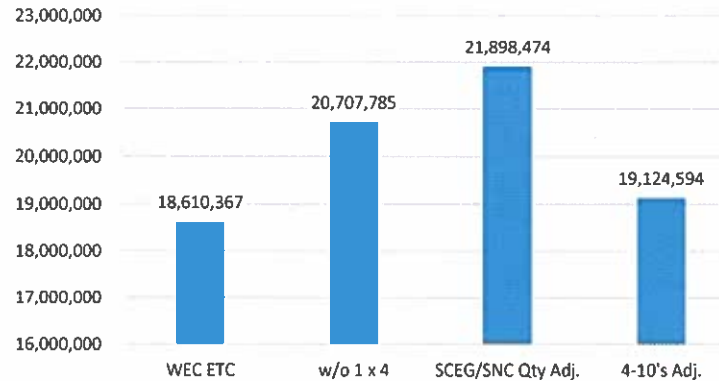
Account	Total Quantities	Quantities Surveyed	Percentage
00 - Civil	591,003	541,974	92%
10 - Concrete	4,462,070	2,097,136	47%
20 - Steel	1,548,780	233,815	15%
30 - Buildings	47,283	-	0%
40 - Equipment	1,440,524	-	0%
41 - Modules	1,268,392	1,268,392	100%
50 - Pipe	4,204,314	536,042	13%
60 - Electrical	7,968,125	2,941,307	37%
70 - Controls	367,983	-	0%
xx - Insulation	Subcontracted	Subcontracted	Subcontracted
xx - Paint	Subcontracted	Subcontracted	Subcontracted
Total	21,898,474	7,618,666	35%

ETC Validation – Quantities

SCE&G Quantity Verification – Direct Hours Impact

Account	Change in Hours (2 Unit Totals)							
	WEC ETC	Removal of 1x4	Prior to Qty Adj.	SCEG/SNC Qty Adj.	%	Prior to Schedule Adj.	Schedule Eff. Adj.	SCEG ETC Final
00 - Civil	461,699	45,727	507,426	83,577	16%	591,003	(71,869)	516,141
10 - Concrete	4,330,063	551,324	4,881,387	(419,317)	-9%	4,462,070	(565,210)	3,896,860
20 - Steel	1,575,983	208,600	1,784,583	(235,803)	-13%	1,548,780	(196,184)	1,352,596
30 - Buildings	42,816	6,039	48,855	(1,572)	-3%	47,283	(5,989)	41,294
40 - Equipment	1,362,110	171,964	1,534,074	(93,550)	-6%	1,440,524	(182,471)	1,258,053
41 - Modules	1,362,717	0	1,362,717	(94,325)	-7%	1,268,392	(160,667)	1,107,725
50 - Pipe	4,003,255	437,755	4,441,010	(236,696)	-5%	4,204,314	(532,560)	3,671,754
60 - Electrical	5,106,276	633,658	5,739,934	2,228,191	39%	7,968,125	(1,009,322)	6,958,803
70 - Controls	365,448	42,351	407,799	(39,816)	-10%	367,983	(46,612)	321,371
xx - Insulation	Subcontracted	Subcontracted	Subcontracted	Subcontracted	-	Subcontracted	Subcontracted	Subcontracted
xx - Paint	Subcontracted	Subcontracted	Subcontracted	Subcontracted	-	Subcontracted	Subcontracted	Subcontracted
Total	18,610,367	2,097,418	20,707,785	1,190,689	6%	21,898,474	(2,773,880)	19,124,594
			111%			106%	-12.67%	87.33%

Change in Hours (2 Unit Totals)



ETC Validation – Unit Rates

Fluor Basis of Estimate

- A site specific project productivity analysis was performed for Vogtle and VC Summer and is incorporated in the estimate. The results were reviewed and agreed upon by the WEC and Fluor Construction teams at Vogtle and VC Summer.
- Craft Performance Factors (PFs) were established by Accounts, Areas, and Units.
- Performance Factors are based on current and previous project experience and information
- on local unions. The analysis focused on the following attributes that drive craft productivity.
 - 1. Craft Availability – Unemployment and Demand
 - 2. Craft Skill Level & Experience
 - 3. Work Space per Person / Congestion
 - 4. Work Week and Hours
 - 5. 40% Night Shift Work
 - 6. Site Conditions / Logistics
 - 7. Work Heights
 - 8. Climate / Temperature / Precipitation
 - 9. Other Site Specific Performance Conditions

ETC Validation – Unit Rates

- Owner engaged High Bridge/Work Management Inc. to independently review Unit Rates.
- Consolidated the Fluor estimate file by combining “like” descriptions for simplification of the piping and electrical estimate files
- Analyzed unit rates for similar types from High Bridge/WMI past projects establishing 48 unit rates.
- Analyzed the data by reviewing the highs and low unit rates.
- Established “key commodity data sheets” for each rate for inclusions/exclusions
- Found variances only in a few minor areas of piping and electrical
- Value of variance <\$30M
- Added line item to Risk Register
- Received general Unit Rate concurrence from Southern Nuclear

ETC Summary

Schedule Model

Schedule Model

- **Methodology: use Bulk Commodities as a schedule driver, input achievable Startup and Power Ascension durations**
- **Earliest schedule dates were converted to durations and these durations were run in risk software @ P80 confidence level to establish new P80 bulk commodity durations.**
- These bulk commodity P80 durations in the Aggressive Schedule were input into P6 and run in the software to establish a new “ETC Pricing” schedule, establishing an end date of Commercial Operations of **8/20/23**
- **Critical Path Commodities - Example below:**

U2 Auxiliary Electrical Bulks – P80 dates on critical path

Activity Description	Aggressive End Date	P80 Most Likely End Date	Duration Days Slip	Aggres. Critical Path
U2-Cable Tray & Supports	4/18/2020	12/19/2020	245	1
U2-Conduit & Supports	7/19/2020	3/22/2021	246	1
U2-Auxiliary Cable Pull	10/18/2020	6/22/2021	247	1
U2-Auxiliary Instruments & Controls	12/19/2020	8/22/2021	246	1

Schedule Model

Critical Path through the Auxiliary Building Established by the estimated “P80” dates

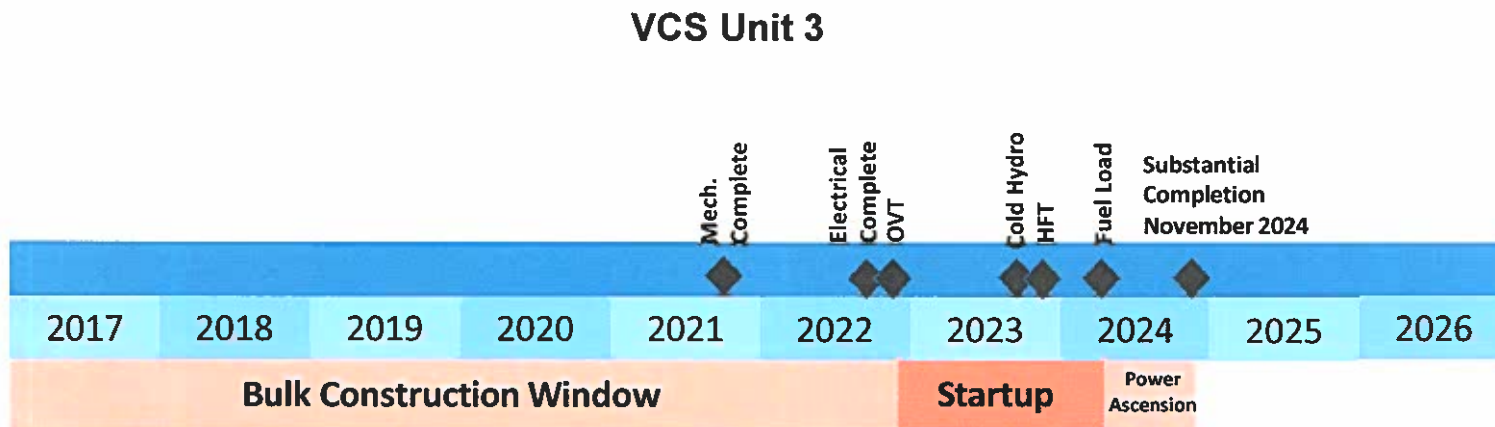
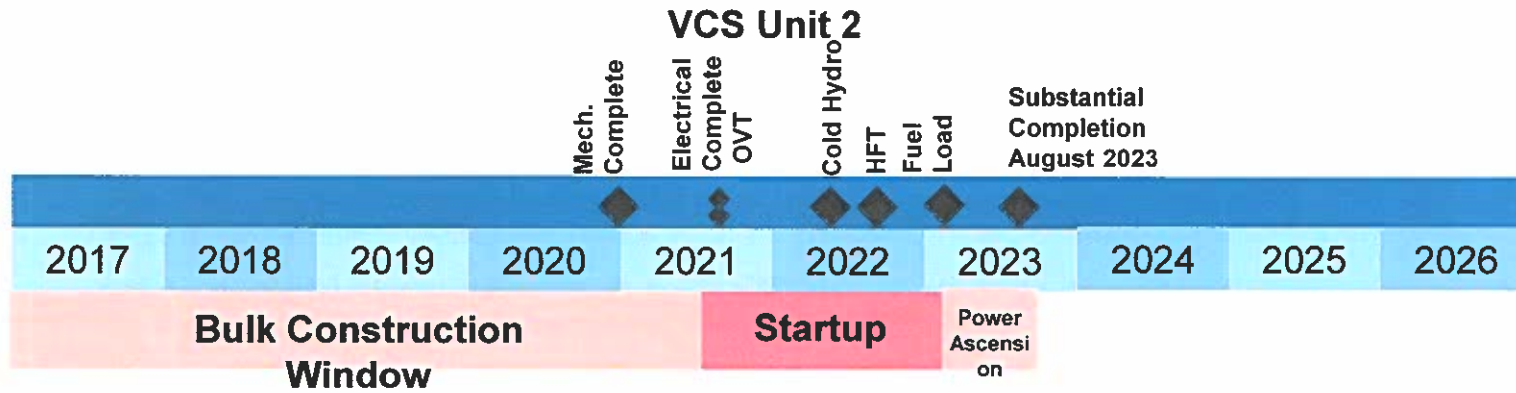
CONSTRUCTION

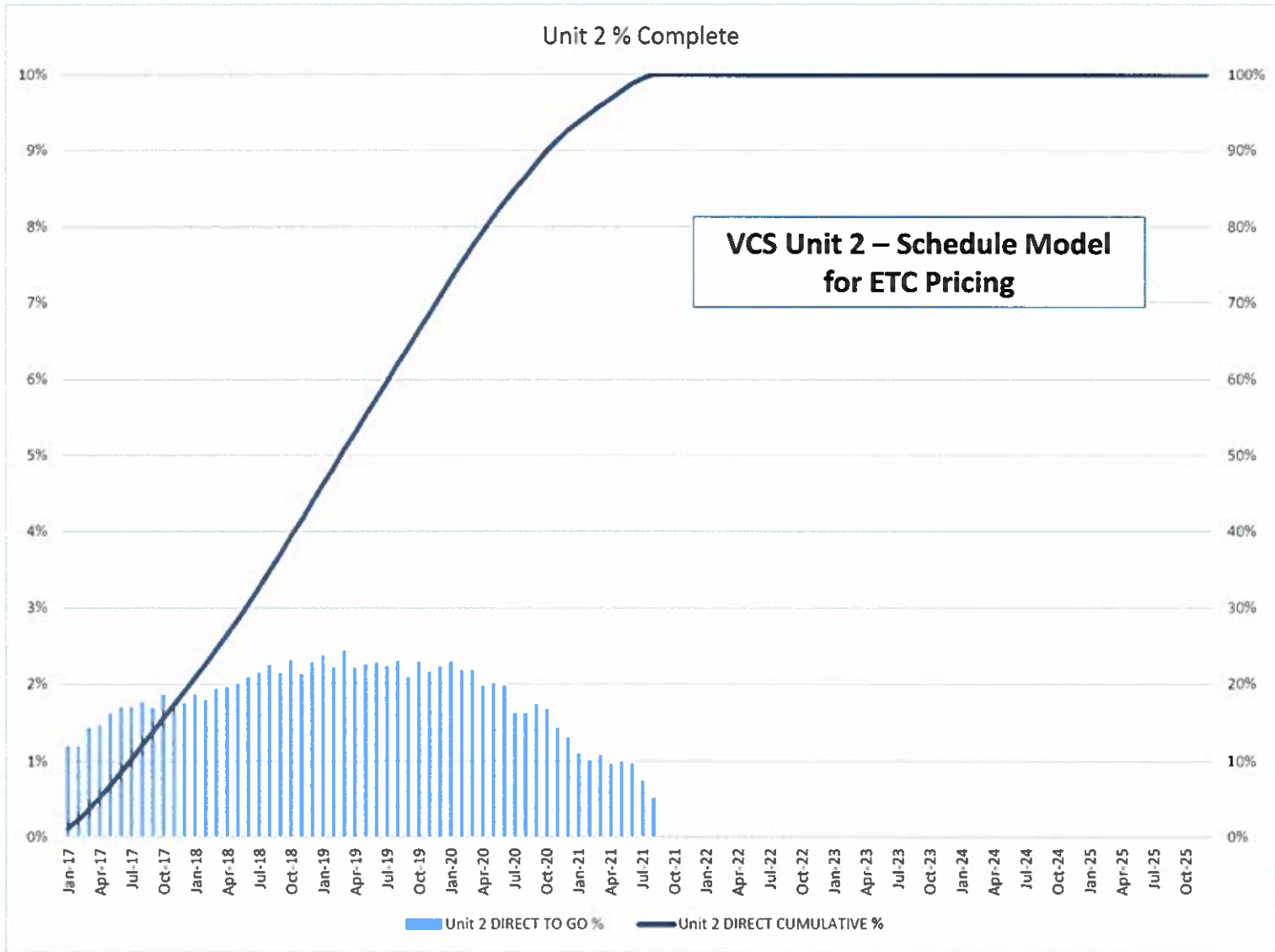
- Rebar, Embeds, Formwork, Concrete (Civil Bulks drive the start of Mechanical and Electrical bulks)
- Start dates (10%) for Large Bore Piping and Cable Tray and Supports drives the Conduit and Cable pulling activities,
- Start dates to Electrical Terminations ultimately drives the Instrumentation bulks,
- Instrumentation drives system turnovers, that drives the startup phase.

STARTUP

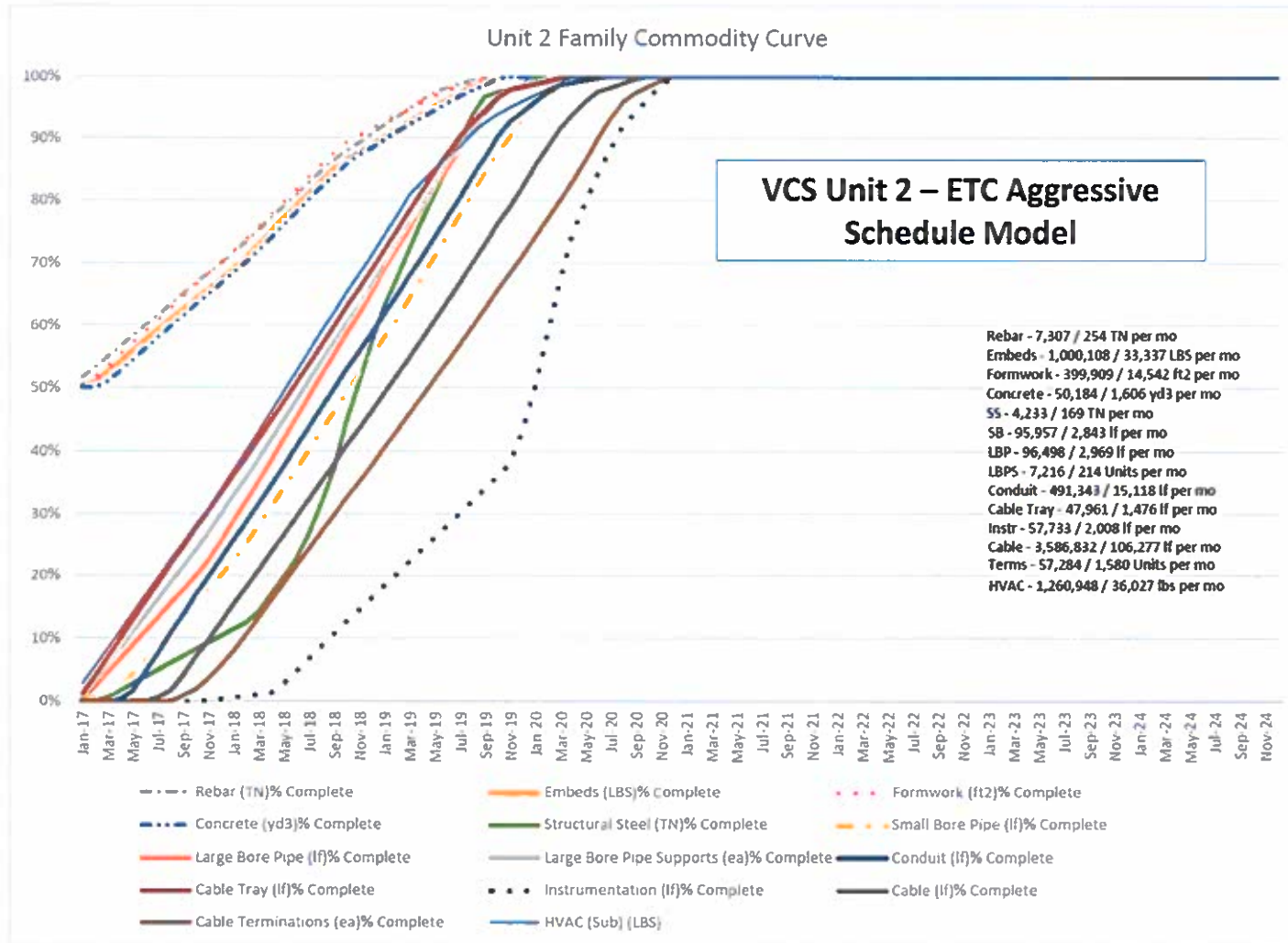
- Open vessel testing (marks the beginning of Startup)
- Startup to Fuel load is critical path with an 18 month duration.
- Fuel Load to Commercial Operations is a 6 month duration.

Schedule Model for ETC Cost Pricing

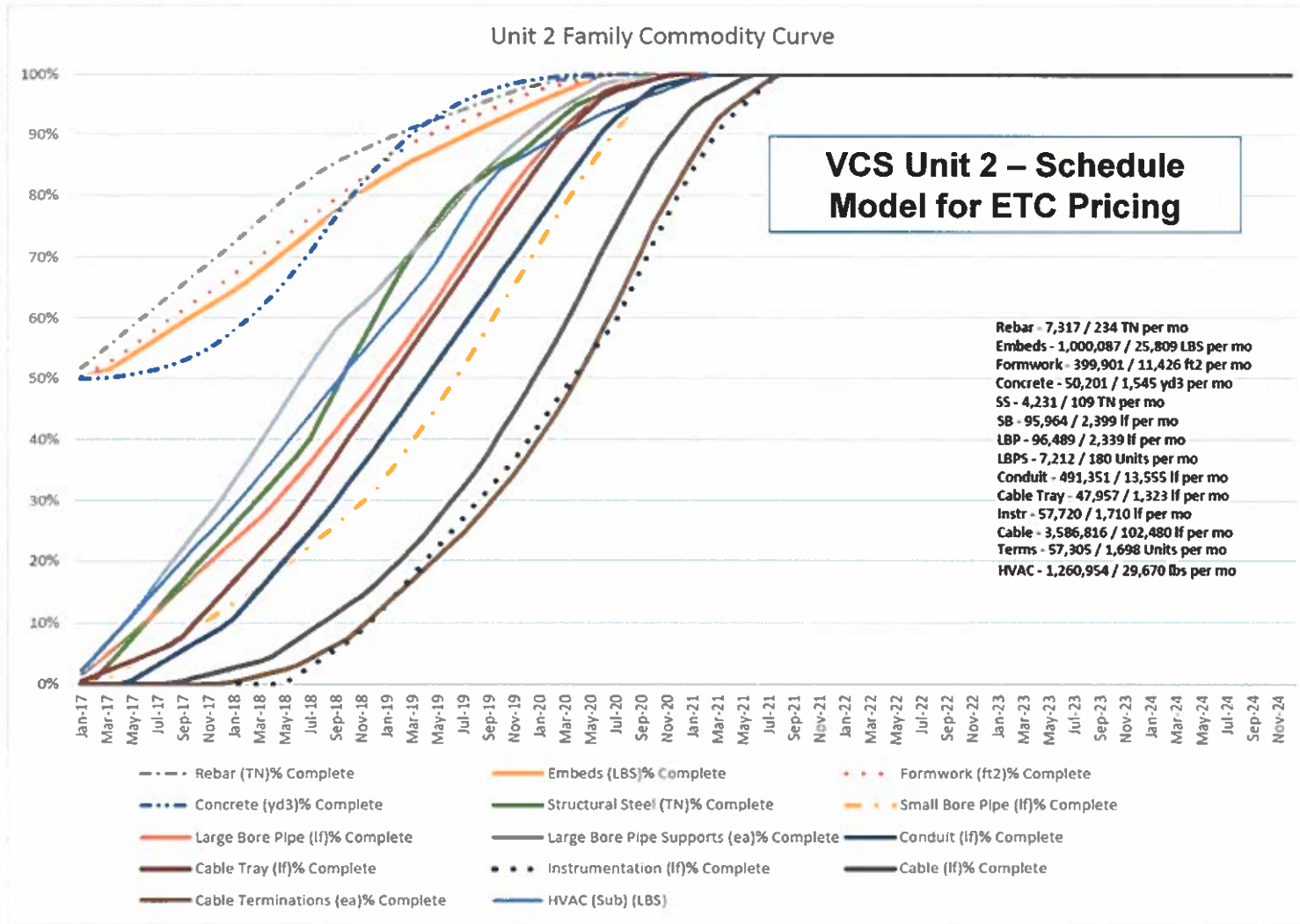




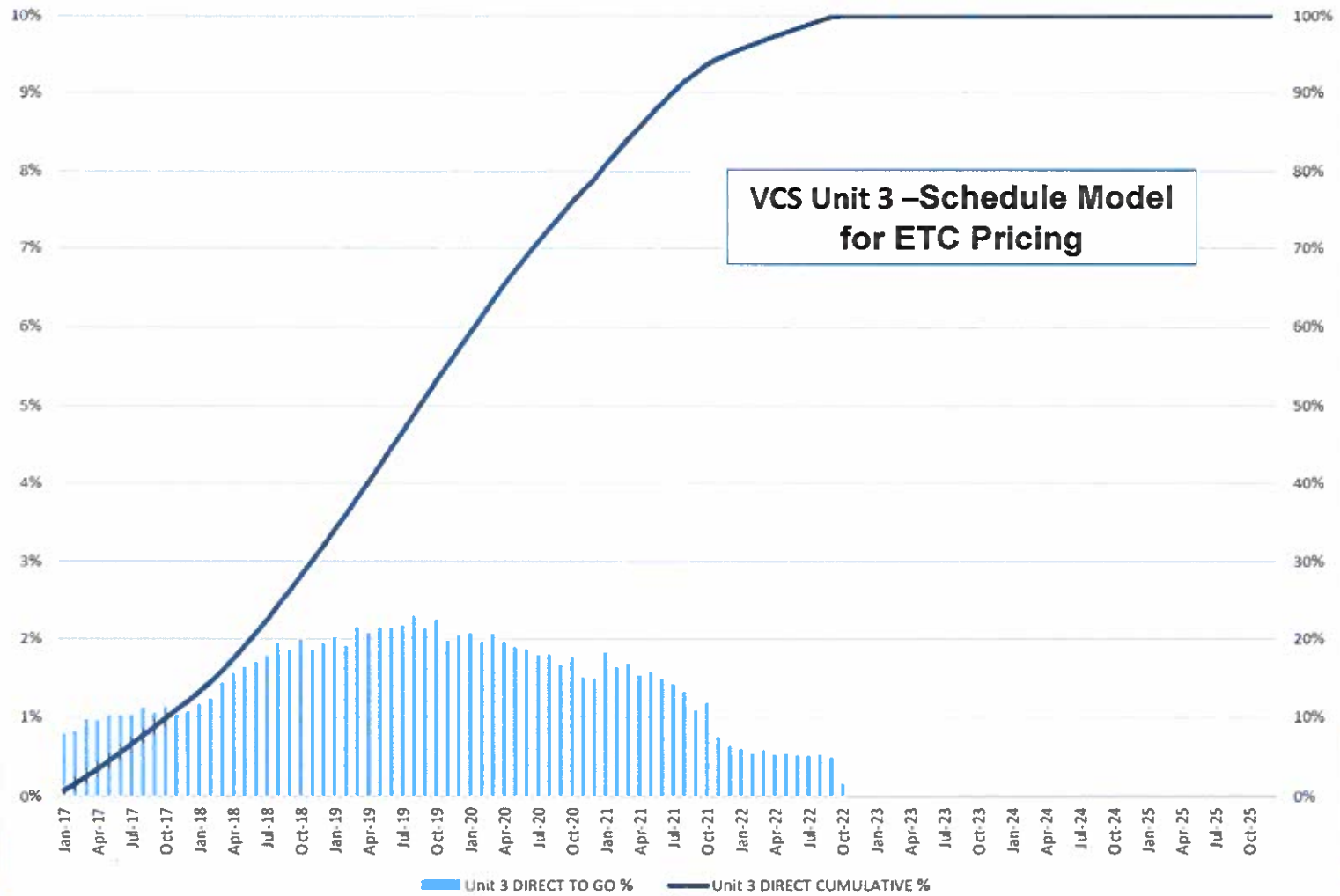
VCS U2 Aggressive Commodity Completion Distribution



VCS U2 Most Likely Commodity Completion Distribution



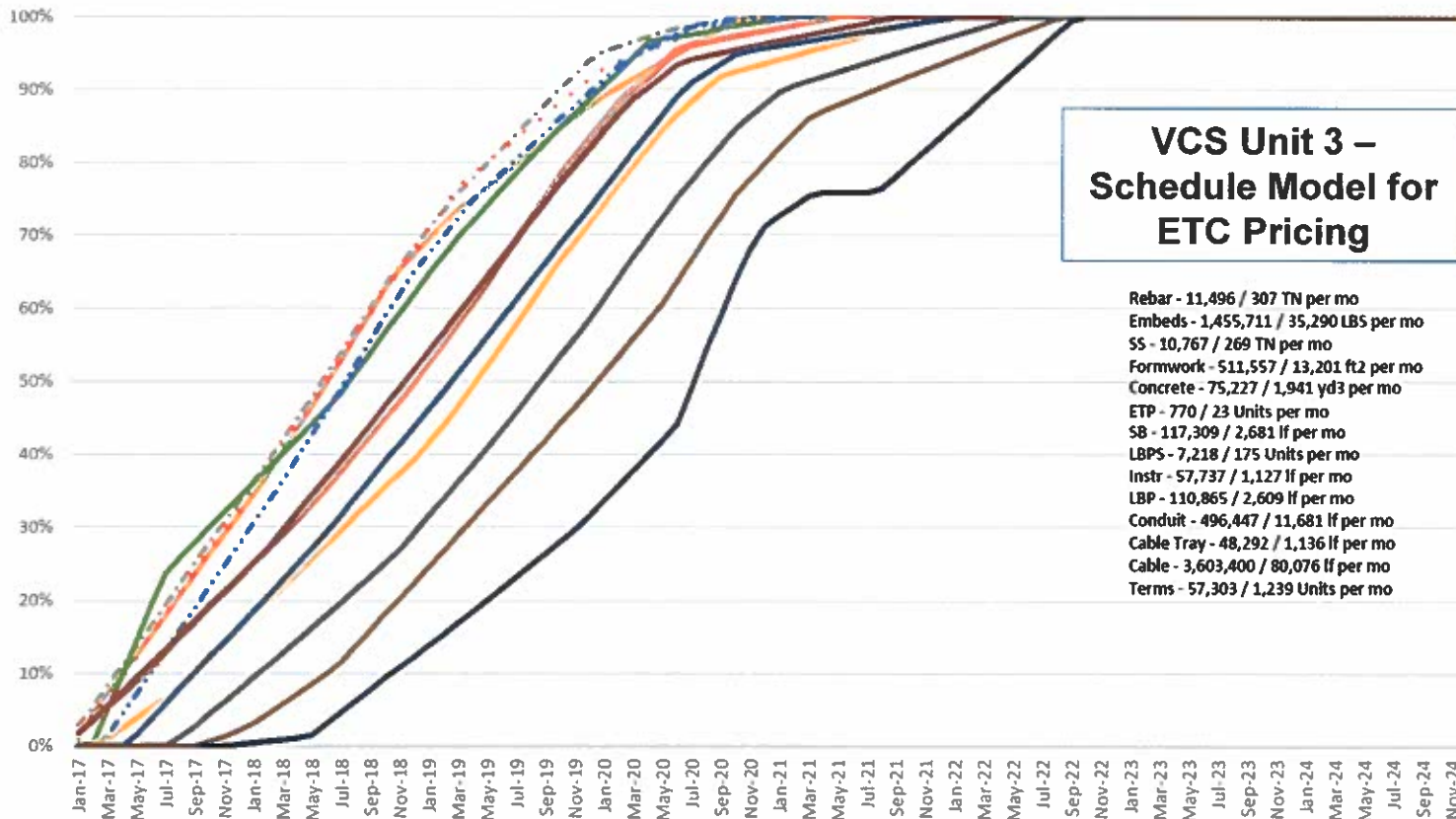
Unit 3 % Complete



VCS Unit 3 –Schedule Model
for ETC Pricing



Unit 3 Family Commodity Curve



VCS Unit 3 – Schedule Model for ETC Pricing

Rebar - 11,496 / 307 TN per mo
 Embeds - 1,455,711 / 35,290 LBS per mo
 SS - 10,767 / 269 TN per mo
 Formwork - 511,557 / 13,201 ft2 per mo
 Concrete - 75,227 / 1,941 yd3 per mo
 ETP - 770 / 23 Units per mo
 SB - 117,309 / 2,681 lf per mo
 LBPS - 7,218 / 175 Units per mo
 Instr - 57,737 / 1,127 lf per mo
 LBP - 110,865 / 2,609 lf per mo
 Conduit - 496,447 / 11,681 lf per mo
 Cable Tray - 48,292 / 1,136 lf per mo
 Cable - 3,603,400 / 80,076 lf per mo
 Terms - 57,303 / 1,239 Units per mo

- Rebar (TN)% Complete
- Formwork (ft2)% Complete
- Large Bore Pipe Supports (ea)% Complete
- Conduit (lf)% Complete
- Cable Terminations (ea)% Complete
- Embeds (LBS)% Complete
- Concrete (yd3)% Complete
- Instrumentation (lf)% Complete
- Cable Tray (lf)% Complete
- Structural Steel (TN)% Complete
- Small Bore Pipe (lf)% Complete
- Large Bore Pipe (lf)% Complete
- Cable (lf)% Complete





Cost Model

Direct and Indirect Assumptions

1. Duration of labor assumes the “ETC Pricing” schedule for budgetary purposes.
2. Craft ratio for per diem is 75% at \$75/day.
3. Work schedule will consist of 70 hour work weeks with a rotating “A” and “B” team for craft. Each craft team will work a base 40 hour per week schedule.
4. One foreman will cover (7) direct craftsmen and one general foreman will be responsible for (3) foreman.
5. Foreman and general foreman will participate in the same rotating shifts that craft work.
6. The proposed base pay increase by Fluor for rotating shifts has been applied to the revised budget (of a 25% wage increase).
7. The revised budget applies an assumption that 80% of staff will work day shift and the 20% remaining will work night shift.
8. Burdens over the base hourly rate have been applied to the budget for straight time hours only.
9. Time off with pay is calculated in the budget, as applicable to each position.

Field Non-Manual Assumptions

1. Duration of labor assumes the “ETC Pricing” schedule for budgetary purposes.
2. Current Field Non-Manual ratio for per diem is 40% and will continue for the project.
3. For budget application, Field Non-Manual’s work schedule vary between a 40 hr and 50 hr per week dependent on job function.
4. The Field Non-Manual craft support ratio is currently 50% on the construction site. The same basis of (1) Field Non-Manual to (2) craftsmen is included in the budget estimate.
5. Burdens over the base hourly rate have been applied to the budget for both straight time and overtime hours.
6. Time off with pay is calculated in the budget for Field Non-Manual staff.

Cost Model

- The Cost Model assumes a Performance Factor of 1.0
- This was determined by adjusting the total earned hours to the SCE&G ETC Quantity Validation results as well as the Fluor provided Unit Rates.
- Total Earned hours were also adjusted for site progress from Dec 2016 to Mar 2017

$$P_f = \frac{\text{Total Spent Hours from VCS 3/31/17 Scorecard}}{\text{Total Adjusted Earned Hours}}$$

$$P_f = \frac{10,487,408 \text{ Spent Hours}}{10,244,021 \text{ Earned Hours}}$$

$$P_f = 1.02$$

- Additional evaluation of earned quantities will further validate Performance Factor assumptions and allow for better performance tracking in the future.

ETC Risk Analysis

Two part Risk Analysis

- Discrete Risk for Cost
- Schedule Risk based on bulk commodities

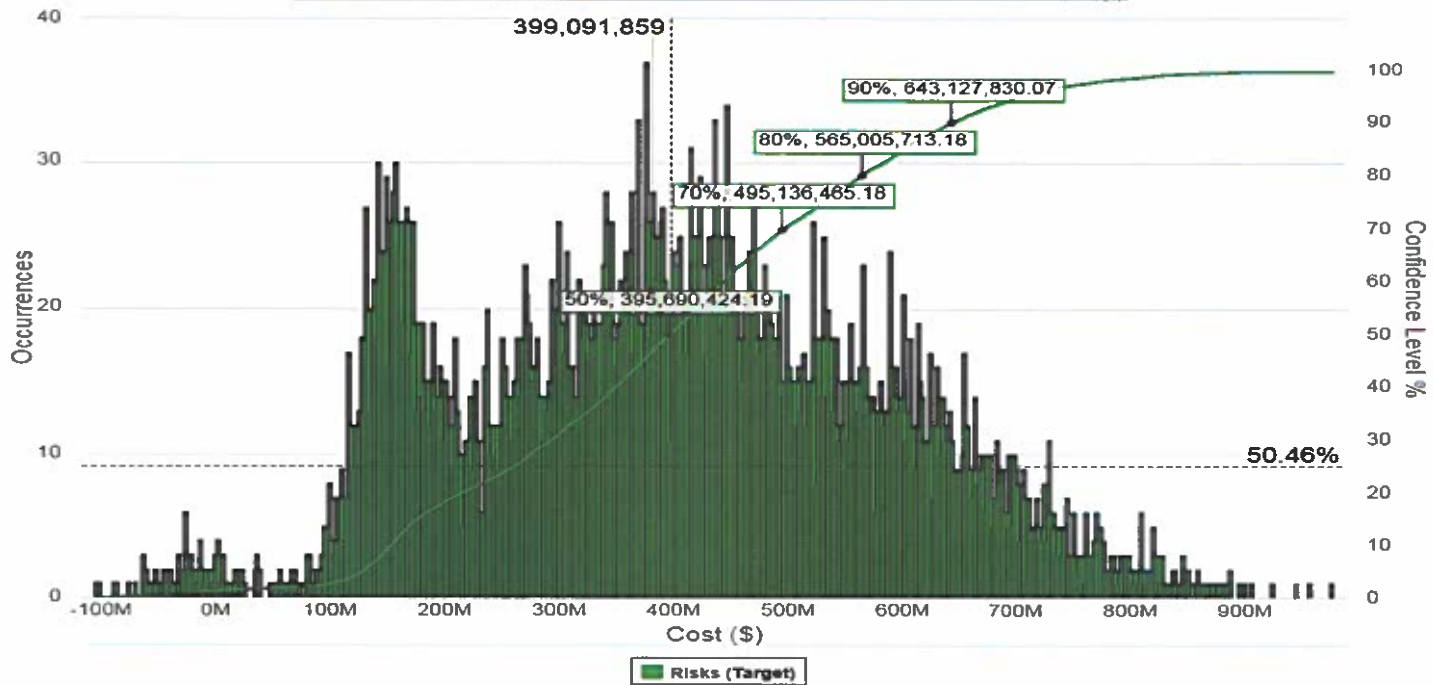
Cost Risk

- The Cost Risk portion of the risk assessment identified project risk and opportunities that could occur during the project.
- Risk Register items were drawn from the Westinghouse risk register and augmented by items identified by project team members.
- Risk events were described as a positive effect “opportunities” for the project (cost reduction) or a negative effect “risks” (cost increase).
- These risks were combined and run in a Monte Carlo simulation and results analyzed.
- The results of the analysis is that the Cost Risk is \$495 million at the 70% confidence level.

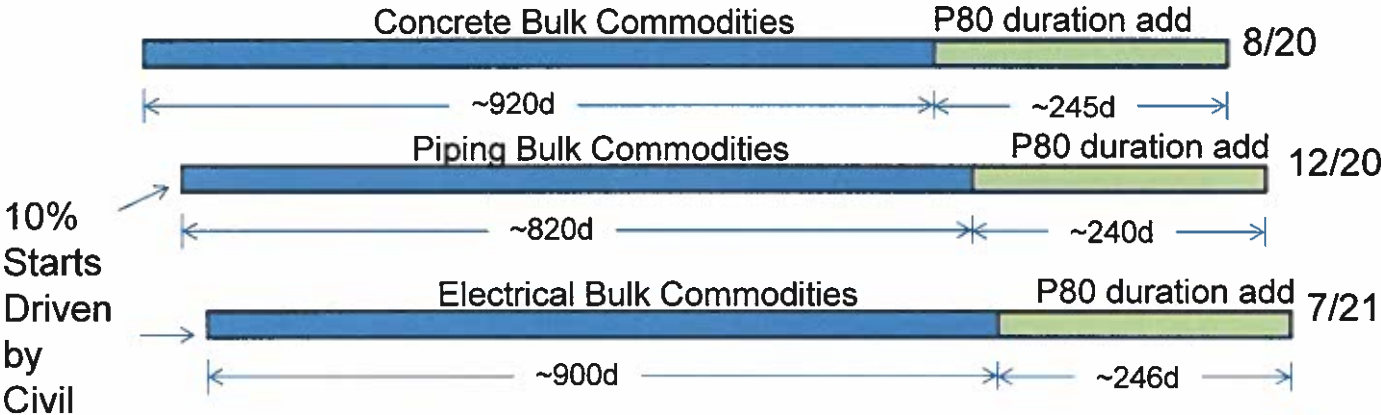
Current Register	Risks (\$mm)	Opportunities (\$mm)
Commissioning	\$ -	\$ -
Construction	\$ 38	\$ (85)
Constr. Dir. Subs	\$ 133	\$ (18)
Engineering	\$ 5	\$ -
I&C	\$ 13	\$ -
Licensing	\$ 13	\$ -
Procurement	\$ 193	\$ -
Project Management	\$ 108	\$ -
Total	\$ 503	\$ (103)
Net Risk EMV is \$399 million.		

Cost Risk

SCE&G ETC RISK REGISTER ANALYSIS



Schedule Risk



Note: Aggressive schedule durations were created from limiting average installation rates per month. Rates were set at a ~35% increase from historical rates based off a 5-day-a-week schedule.

Start of Open Vessel Testing

Schedule Risk

- Aggressive Schedule last meeting
- with reduced manhours of 12.5%

VC Summer Unit 2 & 3 Aggressive Schedule Risk Model									
Descriptions	50%	55%	60%	65%	70%	75%	80%	85%	90%
CO Dates	4/25/2022		8/12/2022		12/5/2022		4/10/2023	6/17/2023	9/1/2023
Months Duration	63.6		67.2		71.0		75.1	77.3	79.8
Note: 01/01/2017 Start date and latest quantity updates incorporated.									

Concrete at current levels 1239 cu. Yds. per month.
 Lg. Pipe at 2816 In. ft./mo.
 Cable Tray at 1552 In. ft./mo.
 Cable at 122,000 In. ft./mo.
 Terminations at 8500 ea./mo.

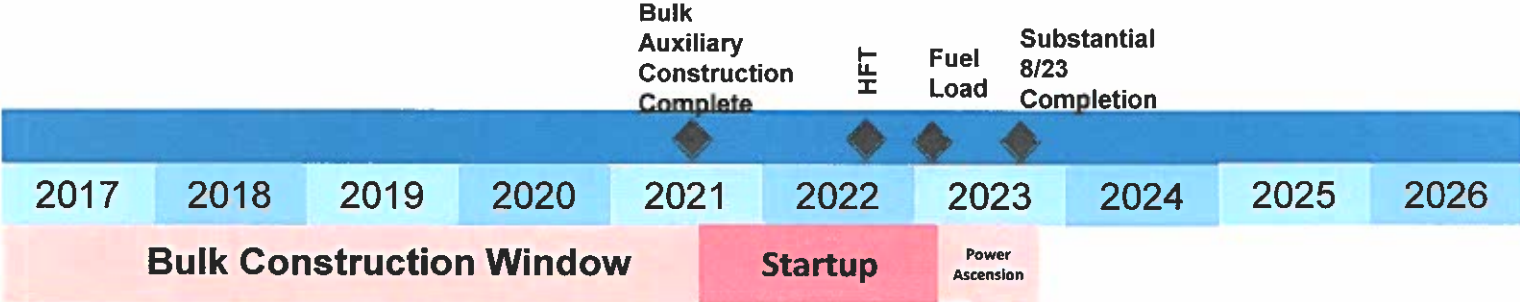
Schedule Analysis

Alternating 4 x 10's

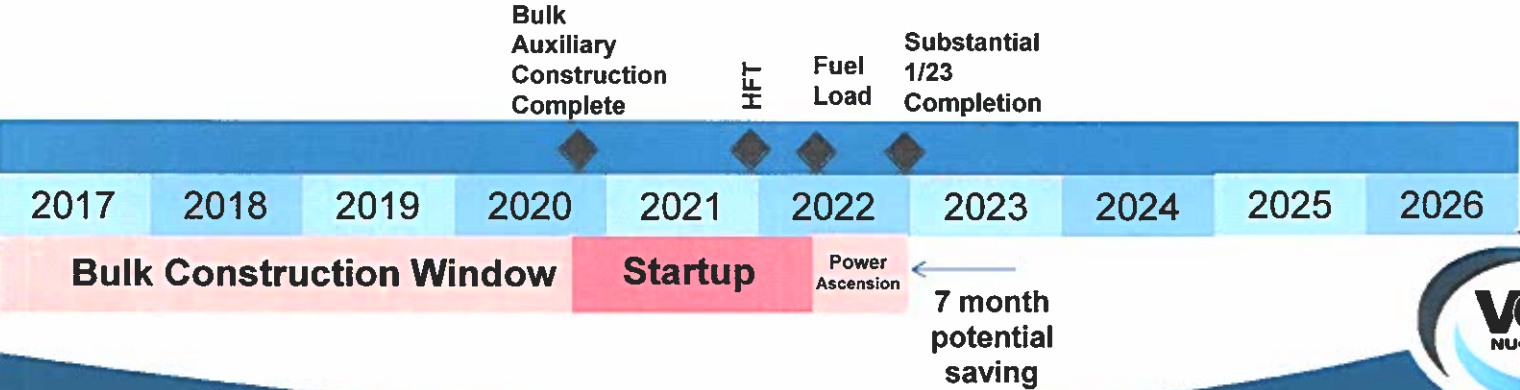
- Historical Concrete Placement rate of 1,239 CY/mo.
(Normalized for new proposed shift)
2 days added to the 5 day work week ($1,239 \times 1.40\% = 1,735$ CY/mo.)
- The 1,735 CY/mo. Concrete rate establishes with other bulk commodities using mid-range installation rates a new potential schedule
 - Finish bulk construction Nov. 10, 2020 (*was July 2021*)
 - Substantial Completion date of Jan. 10, 2023
with 18 month startup (*was Aug 2023*)

Schedule Analysis

VCS Unit 2 – ETC Schedule for Cost Pricing



VCS Unit 2 – ETC Normalized Schedule Potential w/new shift arrangement



**Owner Estimate to Complete
V.C. Summer Units 2 & 3**

Non-Construction	<ul style="list-style-type: none"> • Procurement (Materials & Equipment) • Engineering (Labor) • Instrumentation & Controls • Commissioning • Procurement (Labor) • Project Management • Quality Assurance, Quality Control, ECP • HR/Access Control/FFD • IT Costs • Finance/Accounting • Licensing 	Subtotal
Construction	<ul style="list-style-type: none"> • Construction - Fluor (Direct Craft) • Construction - Fluor (Indirect Craft) • Construction - Fluor (Field Non-Manual) • Construction Direct & Indirect Subcontracts • Construction - Distributables, Equipment/Other 	Subtotal
Other Project-related costs	<ul style="list-style-type: none"> • Escalation • Risk Register • Warranty 	Subtotal
Total "Traditional EPC" Costs		
Owner's Cost	Total Owner's Cost (includes Escalation)	
Total Project ETC Costs		

**VCS 2/3 (MONTHLY)
HOTEL LOAD COSTS
\$Mils**

\$	-
\$	3.5
\$	0.3
\$	0.6
\$	1.2
\$	5.7
\$	1.8
\$	0.2
\$	0.5
\$	0.1
\$	0.3
\$	14.2
\$	27.4
\$	0.5
\$	10.2
\$	38.1
\$	3.5
\$	-
\$	-
\$	3.5
\$	55.8
\$	15.0
\$	70.8

Schedule Risk

Hotel Load

3 Months	\$212 M
7 Months	\$496 M
10 Months	\$708 M

Significant Process Improvements

- Overall
 - Embed Owner personnel directing all Organizations
 - Establish a Level 2 Schedule
 - Complete transition to a proper Project Controls System
- Engineering
 - Establish 120 “Field Design Engineers” to directly support field changes
 - Detailed review of tolerance stack-up between commodities
 - Complete Bi-Furcation of Turbine and BOP
- Subcontracts
 - Reduce Fluor scope to reduce cost and increase Fluor focus on Critical Path and Bulk Commodity work
 - Remove WEC “nuclear” design from Commercial buildings

Significant Process Improvements

- Procurement - Transition to Owner Procurement system
 - Streamlined approvals
 - Min/max system
 - Schedule procurements from Level 2
 - Reduce Staff and Cost due to Program Efficiencies
- Construction
 - Rolling 4x10 Schedule
 - Utilize Night Shift for Setup
 - Complete Bi-furcation of Design, Work Packages, and Work Management
 - Hold Construction (Fluor) accountable for productivity (Vitale study)

Operational Readiness Support Opportunity

- Current approved plan will supply 200 owner employees to various site organizations.
- Employee quantity can increase with adjustment to the owners' training schedule.

- Owner Employee:

Engineer:

- \$88/hour with 20% markup = \$110/hour
- 2080 hours/year X \$110/hour = \$228,800/year
- Staff Augmented Employee:
- Per Diem @ \$100 per day = \$36,500/year
- **Total yearly cost = \$265,300**

Engineer IV:

- \$48.56/hour with 38% markup = \$67.01/hour
- 2080 hours/year X \$67.01/hour = \$139,381/year
- No Per Diem required
- **Total yearly cost = \$139,381**

Cost Difference = \$125,919/year

Operational Readiness Support Opportunity

- Current approved plan will supply 200+ Owner employees to various Construction Site organizations.
- Ownership and accountability in the field could improve
- Can increase beyond 200 with adjustment to the OR Training schedules.

200 Staff Augmented Employees

- \$80/hour average "All-In" rate
- Assume 40% on Per Diem
- **Total 3 year cost = \$112,980,000**

200 Owner Employees

- \$56.55/hour average "All-In" rate
- No Per Diem required
- **Total 3 year cost = \$70,574,400**

3 Year Cost Difference = \$42,405,600

Potential Savings	\$ 113 M
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ETC Summary

Overall Cost Summary

Complete Both Units

Estimate as of June 12, 2017 (\$000,000)	100%	SCE&G %	Santee %
Total Actual Spent	\$ 7,556	\$ 4,169	\$ 3,387
Estimated Costs to Complete			
Estimated "EPC" Costs to Complete	\$ 7,156	\$ 3,936	\$3,220
Estimated Escalation to Complete	\$ 456	\$ 251	\$ 205
Estimated "Owner's" Costs to Complete (w/ Esc)	\$ 1,837	\$ 1,011	\$ 827
Total Estimated Costs to Complete	\$ 9,449	\$ 5,197	\$ 4,252
Total EAC	\$ 17,006	\$ 9,366	\$ 7,639
Parental Guarantee Net of Liens "Flow through"*	\$ (1,785)	\$ (982)	\$ (803)
Total Transmission Costs	\$ 679	\$ 373	\$ 306
Total AFUDC	\$ 812	\$ 447	\$ 365
Total Project Costs	\$ 16,712	\$ 9,205	\$ 7,507
Cost Approved in Order 2016-794	\$ (13,910)	\$ (7,658)	\$ (6,252)
Estimated Cost Increase	\$ 2,802	\$ 1,546	\$ 1,255
Delta Breakdown			
WEC Estimated Overrun	\$ 1,500	\$ 825	\$ 675
Additional Owner Estimated EPC Overrun	\$ 1,999	\$ 1,099	\$ 899
Total Construction Costs Increase	\$ 3,499	\$ 1,924	\$ 1,574
Additional Owner's Costs	\$ 866	\$ 481	\$ 384
Additional Transmission	\$ (5)	\$ (3)	\$ (2)
Additional AFUDC	\$ 228	\$ 125	\$ 103
Toshiba Guarantee	\$ (1,785)	\$ (982)	\$ (803)
Total Estimated Cost Increase	\$ 2,802	\$ 1,546	\$ 1,255

ETC Overview

Overall Cost Summary
2-Unit ETC

Complete Construction of Both Units

Estimate as of June 12, 2017 (\$000,000)	100%	SCE&G %
Total Actual Spent	\$ 7,556	\$ 4,169
Estimated Costs to Complete		
Estimated "EPC" Costs to Complete	\$ 7,156	\$ 3,936
Estimated Escalation to Complete	\$ 456	\$ 251
Estimated "Owner's" Costs to Complete (w/ Esc)	\$ 1,837	\$ 1,011
Total Estimated Costs to Complete	\$ 9,449	\$ 5,197
Total EAC	\$ 17,006	\$ 9,366
Parental Guarantee Net of Liens "Flow through"	\$ (1,785)	\$ (982)
Total Transmission Costs	\$ 679	\$ 373
Total AFUDC	\$ 812	\$ 447
Total Project Costs	\$ 16,712	\$ 9,205
Cost Approved in Order 2016-794	\$ (13,910)	\$ (7,658)
Estimated Cost Increase	\$ 2,802	\$ 1,546
Delta Breakdown		
WEC Estimated Overrun	\$ 1,500	\$ 825
Additional Owner Estimated EPC Overrun	\$ 1,999	\$ 1,099
Total Construction Costs Increase	\$ 3,499	\$ 1,924
Additional Owner's Costs	\$ 866	\$ 481
Additional Transmission	\$ (5)	\$ (3)
Additional AFUDC	\$ 228	\$ 125
Toshiba Guarantee	\$ (1,785)	\$ (982)
Total Estimated Cost Increase	\$ 2,802	\$ 1,546

These Costs are DRAFT and contain assumptions that need to be validated.

Complete Construction of Both Units

Comparison to SCPSA Board-Approved Budget for Fixed Price Option

Estimate as of June 12, 2017 (\$000,000)

Total Actual Spent thru 3/31/17 (Construction + Initial Fuel Core)		\$ 3,460
Estimated Costs to Complete		
Estimated "EPC" Costs to Complete	\$ 3,220	
Estimated EPC Escalation to Complete	\$ 205	
Estimated "Owner's" Costs to Complete (w/ Escalation)	\$ 827	
Estimated Initial Fuel Core Costs to Complete	\$ 37	
Total Estimated Costs to Complete		\$ 4,289
Total Estimate at Completion (Construction + Initial Fuel Core)		\$ 7,749
Parental Guaranty (Net of Liens)		\$ (803)
Total Transmission Costs in Approved Budget		\$ 261
Total Project Costs		\$ 7,207
SCPSA Board-Approved Budget for Fixed Price Option^{1,2}		\$ (6,114)
Estimated Cost Increase		\$ 1,093

These Costs are DRAFT and contain assumptions that need to be validated.

¹ SCPSA board-approved budget excludes capitalized interest and cost increase estimate does not include impact of additional capitalized interest due to delay.

² The production tax credit bonus allowance of \$135 million was removed from the total approved \$6,249 million budget.

Owner Estimate to Complete V.C. Summer Units 2 & 3

OWNER ETC
(6/12/17
PRESENTATION)
\$Mils

		OWNER ETC (6/12/17 PRESENTATION) \$Mils
Non-Construction	• Procurement (Materials & Equipment)	\$ 823
	• Engineering (Labor)	\$ 297
	• Instrumentation & Controls	\$ 130
	• Commissioning	\$ 235
	• Procurement (Labor)	\$ 147
	• Project Management	\$ 325
	• Quality Assurance, Quality Control, ECP	\$ 177
	• HR/Access Control/FFD	\$ 31
	• IT Costs	\$ 72
	• Finance/Accounting	\$ 8
	• Licensing	\$ 61
		Subtotal
Construction	• Construction - Fluor (Direct Craft)	\$ 1,323
	• Construction - Fluor (Indirect Craft)	\$ 721
	• Construction - Fluor (Field Non-Manual)	\$ 437
	• Construction Direct & Indirect Subcontracts	\$ 1,231
	• Construction - Distributables, Equipment/Other	\$ 581
		Subtotal
Other Project-related costs	• Escalation	\$ 456
	• Risk Register	\$ 495
	• Warranty	\$ 62
	Subtotal	\$ 1,013
Total "Traditional EPC" Costs		\$ 7,612
Owner's Cost	Total Owner's Cost (includes Escalation)	\$ 1,837
Total Project ETC Costs		\$ 9,449

ETC Status

Not Complete
In Initial Review
In Final Review

Markups & Fee Assumptions

<u>Company</u>	<u>Type of Cost</u>	<u>Basis</u>	<u>Burden/ Markup</u>	<u>OH Rate</u>	<u>Fee</u>
Fluor	Craft	W2 Pay w/ Taxes	15.59%	\$1/HR	4%
	FNM - HO	W2 Pay + 13.5% TOWP	38%	\$31.50/HR	4%
	FNM - Site	W2 Pay + 13.5% TOWP + 5% for HO Assigned	39%	\$6.50/HR	4%
	Living Allowance	\$3,850/Month (Includes 1 Trip home/Month)			4%
	Per Diem	\$100/Day			4%
	Expenses	3rd Party Cost			4%
WEC	FNM - HO	W2 Pay	3.20		7%
	FNM - Site	W2 Pay	3.00		7%
	Living Allowance				7%
	Expenses	3rd Party Cost	5.5%		7%
WECTEC	FNM - HO	W2 Pay	2.20		7%
	FNM - Site	W2 Pay	2.00		7%
	Living Allowance				7%
	Expenses	3rd Party Cost	5.5%		7%
WECTEC Staffing	FNM - HO	W2 Pay (higher base pay)	1.35		7%
	FNM - Site	W2 Pay (higher base pay)	1.35		7%
	Living Allowance	\$2,800/Month			7%
	Expenses	3rd Party Cost	5.5%		7%
Staff Aug	FNM - Site	W2 Pay (higher base pay)	1.18-1.7		0%
	Living Allowance	\$2,800/Month			0%

ETC - Subcontracts

	WEC Manhours	SCE&G ETC Manhours	WEC ETC Amount	SCE&G ETC Amount
			Aug 2016 Baseline	March 31, 2017 Baseline
Indirect Subcontracts	Not given	661,808	\$171,635,899	\$78,352,285
Direct Subcontracts	4,604,410*	9,149,711	\$694,580,151	\$1,152,679,678
Totals	Not given	9,811,519	\$866,216,050**	\$1,231,031,963
		* Alternate number given by WEC ETC Team was 5.4M hours		
		** Alternate number given by WEC Controller was \$751M		

ETC – Subcontracts

WEC ETC Process

- WEC's ETC baseline subcontract costs used their archived statistical data at face value without a thorough deep dive into each subcontractor, or the without investigating the sources of the unawarded values.
- They then began a discounting process based on the 1 x 4 concept & cost reduction goals through more aggressive negotiations, and targeting discount values for existing change order proposals.
- Our review of the WEC process during the development of the Owner ETC was perceived to be a mix of loosely compiled statistical information without a thorough review of each subcontractor.

ETC – Subcontracts

Owner ETC Process

- Our approach to evaluating and estimating new values for the subcontracts phase consisted of receiving and reviewing the WEC provided eight (8) source documents.
- We then spent several weeks isolated with the WECTEC Subcontracts group to evaluate 107 subcontractors to determine the source of the WEC value for each subcontract. We discussed and evaluated the perceived subcontractors attitude toward the project and the bankruptcy development, along with discussing their financial condition, risk of continuing or performing on the project, reviewing the contract financial status including all changes, change request, & potential changes. Finally we interviewed the subcontract administrator's insight of any relationship dynamics that do not show up in the statistical data.
- As a part of that process, we established new ETC values for each line item and recorded our notes, assumptions, & risks for each one.

ETC - Owner's Cost (Complete Both Units)

- For Budgeting purposes, assumed original "Owner's" scope remained the same. This will be refined as DOR's are finalized and we transition to an Owner Controlled Site.
- Basis is the February 2017 budget adjusted for impact of the delay (U2= 48months, U3=52months).
- Remaining in PSC Approved Budget approximately \$1.013B (CY 100%).
- Cost to Complete estimated at approximately \$1.878B (CY 100%) or \$866M in additional costs.

ETC - Owner's Cost (Complete Both Units)

- Significant Drivers of Increase (escalated dollars)
 - NND Labor - \$542M Approximately 99% due to delay
 - NND Non Labor \$174M
 - Due to Delay \$164M
 - Site Layout \$29M (transfer from CO to Owners)
 - Decrease (\$19M) for contractors moved to ETC and other adjustments
 - SCANA Services \$150M
 - Due to Delay \$43M
 - Spare Parts \$72M
 - Sales Tax \$29M (transfer from T&M to Owner)
 - Miscellaneous adjustments \$6M

ETC Summary

DRAFT

Overall Cost Summary

1-Unit ETC

AECOM Study

- Scenarios
 - Defer both Units
 - Abandon or Brownfield both Units
 - Complete U2, Defer, Abandon, or Brownfield U3
 - Defer U2, Abandon or Brownfield U3
- Approach
 - Conducted data gathering, site walk down & interviews
 - Assumptions were made per SME's judgements, where data not available
 - Excludes Owner's ETC Costs
- Key Assumptions
 - ROM estimated with accuracy of -30% to +50%
 - Salvage assumed at 43% of value. Recent historical trends are 10%-40%.
 - Sale of salvaged items needs to occur in 5 years, otherwise value would be scrap

AECOM Study

Incremental Cost Impact (\$'000,000)				
Scenarios		UNIT 2	UNIT3	TOTALS
		(\$)	(\$)	(\$)
Defer both units (UNIT 2: 1 YR, UNIT 3: 2 YRS)		207	310	517
Salvage				
	Cost to Remove	37	16	53
	PM & Storage Costs	27	27	53
	Transportation Costs	155	142	297
	Total Cost to Salvage	219	184	403
	Cash from "Customer"	(656)	(608)	(1,264)
	Net Salvage	(437)	(424)	(861)
Abandon both units (AFTER SALVAGE)		3	2	5
Brownfield both units (AFTER SALVAGE)		14	10	24
Complete UNIT 2	Defer UNIT 3 (for 2 years)	-	310	310
	Abandon UNIT 3 (AFTER SALVAGE)	-	(422)	(422)
	Brownfield UNIT 3 (AFTER SALVAGE)	-	(414)	(414)

Complete Unit 2

Owner Estimate to Complete		\$Mils
Non-Construction	<ul style="list-style-type: none"> • Procurement (Materials & Equipment) • Engineering (Labor) • Instrumentation & Controls • Commissioning • Procurement (Labor) • Project Management • Quality Assurance, Quality Control, ECP • HR/Access Control/FFD • IT Costs • Finance/Accounting • Licensing 	\$ 494 \$ 202 \$ 51 \$ 137 \$ 100 \$ 195 \$ 120 \$ 21 \$ 64 \$ 3 \$ 42
Subtotal		\$ 1,430
Construction	<ul style="list-style-type: none"> • Construction - Fluor (Direct Craft) • Construction - Fluor (Indirect Craft) • Construction - Fluor (Field Non-Manual) • Construction Direct & Indirect Subcontracts • Construction - Distributables, Equipment/Other 	\$ 1,303 \$ 704 \$ 265
Subtotal		\$ 2,271
Other Project-related costs	<ul style="list-style-type: none"> • Escalation • Risk Register • Warranty 	\$ 232 \$ 337 \$ 31
Subtotal		\$ 599
Demobilization Costs of Unit 3		\$ -
Total "Traditional EPC" Costs		\$ 4,301
Owner's Cost	Total Owner's Cost (includes Escalation)	\$ 1,266
Total Project ETC Costs		\$ 5,567

These Costs are
DRAFT and contain
assumptions that
need to be
validated.

Complete Construction of Unit 2, Defer Unit 3 for 2 Years

Estimate as of June 12, 2017 (\$000,000)	100%	SCE&G %
Total Actual Spent	\$ 7,556	\$ 4,169
Estimated Costs to Complete		
Estimated "EPC" Costs to Complete	\$ 4,069	\$ 2,238
Estimated Escalation to Complete	\$ 232	\$ 128
Estimated "Owner's" Costs to Complete (w/ Esc)	\$ 1,266	\$ 696
Total Estimated Costs to Complete	\$ 5,567	\$ 3,062
Total EAC	\$ 13,123	\$ 7,231
Parental Guarantee Net of Liens "Flow through"	\$ (1,785)	\$ (982)
Total Transmission Costs	\$ 679	\$ 373
Total AFUDC	\$ 618	\$ 340
Total Project Costs	\$ 12,635	\$ 6,963
Incremental Cost to Defer Unit 3 *	\$ 310	\$ 171
Total Project Costs to Finish Unit 2, Defer Unit 3	\$ 12,945	\$ 7,133
Cost Approved in Order 2016-794	\$ (13,910)	\$ (7,658)
Estimated Cost Increase	\$ (965)	\$ (525)
Delta Breakdown		
Total Construction Cost Increase	\$ 188	\$ 103
Cost to Defer Unit 3	\$ 310	\$ 171
Additional Owner's Costs	\$ 294	\$ 167
Additional Transmission	\$ (5)	\$ (3)
Additional AFUDC	\$ 34	\$ 19
Toshiba Guarantee	\$ (1,785)	\$ (982)
Total Estimated Cost Increase	\$ (965)	\$ (524)

These Costs are DRAFT and contain assumptions that need to be validated.

* Fixed cost of deferral which covers a 4 month ramp-down and 6 month ramp-up period is estimated to be \$162.6M. Additional costs to maintain the site exclusive of the ramp-down and ramp-up periods is estimated at \$10.5M per month, or \$127M per year.

Complete Construction of Unit 2, Abandon Unit 3

Estimate as of June 12, 2017 (\$000,000)	100%	SCE&G %
Total Actual Spent	\$ 7,556	\$ 4,169
Estimated Costs to Complete		
Estimated "EPC" Costs to Complete	\$ 4,069	\$ 2,238
Estimated Escalation to Complete	\$ 232	\$ 128
Estimated "Owner's" Costs to Complete (w/ Esc)	\$ 1,266	\$ 696
Total Estimated Costs to Complete	\$ 5,567	\$ 3,062
Total EAC	\$ 13,123	\$ 7,231
Parental Guarantee Net of Liens "Flow through"	\$ (1,785)	\$ (982)
Total Transmission Costs	\$ 679	\$ 373
Total AFUDC	\$ 618	\$ 340
Total Project Costs	\$ 12,635	\$ 6,963
Cost to Abandon Unit 3	\$ 2	\$ 1
Total Project Costs to Finish Unit 2, Abandon Unit 3	\$ 12,637	\$ 6,964
Cost Approved in Order 2016-794	\$ (13,910)	\$ (7,658)
Estimated Cost Increase	\$ (1,273)	\$ (695)
Delta Breakdown		
Total Construction Cost Increase	\$ 188	\$ 103
Cost to Abandon Unit 3	\$ 2	\$ 1
Additional Owner's Costs	\$ 294	\$ 167
Additional Transmission	\$ (5)	\$ (3)
Additional AFUDC	\$ 34	\$ 19
Toshiba Guarantee	\$ (1,785)	\$ (982)
Total Estimated Cost Increase	\$ (1,273)	\$ (695)

These Costs are DRAFT and contain assumptions that need to be validated.

Process to Finalize ETC

<u>Step</u>	<u>Status</u>
Review Westinghouse ETC	99% Complete
Receive Transition Plan Assumptions	80% Complete
Assemble ETC Schedule Range	75% Complete
Assemble ETC Cost Estimate	80% Complete
Review Estimate and Schedule (Includes External Cold-Body Review)	50% Complete
Scrub Estimate for Inconsistencies	30% Complete
Adjust for a 1-Unit ETC	25% Complete
Report and Receive Concurrence of Major Assumptions	
Verify and Adjust Estimate	
Finalize Estimate	
Incorporate Management Comments	
Prepare Report	

Questions

- 1-31. Please describe the actions SCE&G has taken to ensure the proper preservation of equipment and component remaining on site.
- 1-32. Please discuss the Company's quality assurance program with regard to demobilization activities.
- 1-33. Please provide the status of the training simulators for the Units and the associated training materials. Also, discuss the Company's decision regarding the simulator (e.g., retain, salvage).
- 1-34. Please provide a categorized list of all unpaid invoices to include the dollar amount associated with each invoice.
- 1-35. Please provide a list of any and all items that have been salvaged and the dollar amount received from each salvaged item.
- 1-36. Please provide a list of any and all items anticipated to be salvaged and the estimated dollar amount to be received from each salvaged item.
- 1-37. Please discuss the level and processes in place to ensure adequate security for the site.
- 1-38. Please identify and list all equipment and buildings associated with the Units that will be supporting V.C. Summer Unit 1 after the abandonment.
- 1-39. Please provide an estimated cost to preserve the site for future restart (within 2 years, 5 years and 10 years).
- 1-40. Please provide a copy of the process to be used by WEC and SCE&G to determine ownership of equipment and components related to the Units.
- 1-41. Please provide a comprehensive list of major equipment and components by owner (WEC or SCE&G) related to the Units
- 1-42. Please provide any agreements/contracts between SCE&G and salvage vendors.
- 1-43. Provide all written documents detailing the cost of abandoning versus preserving or "mothballing" the site.