July 28, 2025

William J. Brown, P.E., Regional Engineer
Federal Energy Regulatory Commission
3700 Crestwood Parkway NW, Suite 950
Duluth, GA 30096

Subject: Dominion Energy South Carolina, Inc.
Saluda Project P-516, NATDAM No. SC00224

RE: 2025 Annual Dam Safety Inspection Follow-up

Dear Mr. Brown:

In reference to your Dam Safety Inspection Follow-up letter to Ms. Iris Griffin dated May 23, 2025, Dominion Energy South Carolina, Inc. (DESC) submits the following responses to Comments 1 and 2:

1. Evaluate the reason for the ponded water in Unit 5 arch conduit that prevented the arch conduit inspection. Determine if the reason has any potential dam safety concerns.

Response: DESC staff believe the cause of the ponded water to be a mechanical malfunction affecting the pumping capacity of the sump pump that removes collected water from the arch conduit. Plant staff inspected the pump but were unable to identify a root cause of the pump's degraded performance. Subsequent review of the pump specifications indicates that the pumps were designed for a maximum head which is near the operating head needed to pump from the arch conduit to the discharge point. Normal wear on the pump would reduce operating efficiency and eventually result in the pump not pumping at a rate greater than the approximately 10 gallon per minute (GPM) seepage rate into the arch conduit.

An analysis of monthly arch conduit seepage readings supports the hypothesis of pump degradation allowing water to pool in the arch conduit. Pumped water displacement from the arch conduit is measured monthly as arch conduit seepage. May 2025 arch pumping rate reading was 11.22 gal/min, which is lower than expected given the volume of pooled water in the arch conduit. From January 2022 to July 2024 (month of last arch conduit inspection, in which full arch conduit was accessible and no atypical ponding was observed), the arch conduit pumping rate ranged from 7.47 to 18.06 gal/min and averaged 10.65 gal/min. From August 2024 to July 2025, arch conduit seepage measurement ranged from 7.24 to 11.83 gal/min and averaged 9.63 gal/min. Comparing these pumping rate averages from before and after the July 2024 arch conduit inspection, the pumped water displacement rate was 1.02 gal/min lower in the timespan after the inspection. Assuming actual water seepage into the arch conduit did not change, and assuming pump degradation began the day after the July 2024 inspection, the difference in pumped water displacement rates would result in about 400,000 gallons pooled in the arch conduit. This checks with an estimate made from calculating the volume of the arch conduit and entry area at the water depth observed during the annual inspection in May.

The Saluda plant staff contracted an external maintenance consultant to conduct necessary repairs of the pump system. The consultant has recommended that the pumps should be replaced, and the pump replacement will also require replacement of the guide rails to which the pumps are mounted. DESC does not have a firm schedule for performing this work as the plant is still working with suppliers to finalize equipment selection and delivery schedule. In the interim, DESC will install a temporary submersible pump in one of the access shafts in the drainage gallery and pump the water to the gallery drain trench for discharge to the river via the gallery drain system. The temporary pump is planned to be installed during the week of July 28, 2025.

With the determined root cause of the arch conduit ponding being pump performance degradation, DESC does not believe there has been an increase in leakage from Penstock 5 or the arch conduit that would present a concern to dam safety. The plant will attempt to pump the ponded water out of the

penstock using the temporary submersible pump to facilitate a full arch conduit inspection by Dam Safety staff. Findings pertinent to dam safety will be immediately communicated to the FERC ARO, and the entirety of the inspection report will be documented in the 2025 Saluda DSSMR as well as shared with the 11th Part 12D Periodic Inspection independent consultant team.

2. As a reminder, your 11th Part 12D Periodic Inspection independent consultant should include a review of the following:

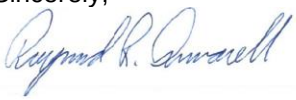
   a. The findings and recommendations in the Chao and Associates, Inc. structural evaluation report submitted March 29, 2023. (Plan and Schedule submitted in DESC March 4, 2025, letter)

   b. The findings and recommendations from the July 7, 2023, Schnabel Engineering, LLC, geophysical report and DESC's subsequent monitoring. (Plan and schedule submitted in DESC August 19, 2024, letter)

Response: All materials pertaining to these items were provided to the IC team and discussed during the PI. A review will be included in the Periodic Inspection Report (PIR).

If you have questions regarding this submittal, please contact the undersigned at 803-217-7322 or raymond.ammarell@dominionenergy.com.

Sincerely,



Raymond R. Ammarell, P.E., Manager
Dam Safety and Hydro Compliance
Chief Dam Safety Engineer (South Carolina)

RRA/arr

c: J. W. Miller/H. E. Delk/I. N. Griffin/SH File
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