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OFFICE  
RULE  
ADJUDICATION

Ms. Annette L. Viette-Cook  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET NUMBER  
PROPOSED RULE **PR 73**  
(65FR36649)

Attention: Rulemakings and Adjudications Staff

Dear Ms. Viette-Cook:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NPF-12  
Comments on 10CFR73 "Re-Evaluation of Power Reactor Physical  
Protection Regulations and Position on a Definition of Radiological  
Sabotage" (65FR36649, June 9, 2000)

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South Carolina Electric & Gas Company (SCE&G) has reviewed SECY-00-0063, "Staff Re-Evaluation of Power Reactor Physical Protection Regulations and Position on Definition of Radiological Sabotage". SCE&G endorses comments provided by the Nuclear Energy Institute relative to this matter.

Additionally, SCE&G submits the following comments:

South Carolina Electric & Gas Co  
Virgil C. Summer Nuclear Station  
P. O. Box 88  
Jenkinsville, South Carolina  
29065

The term radiological sabotage either needs to be defined as it pertains to this rule or as specified in NUREG-1178, "Vital Equipment/Area Guidelines Study: Vital Area Committee Report." If the definition of radiological sabotage is not as defined in NUREG-1178, a clear explanation needs to be provided for the basis of the difference.

The current defensive strategy is designed around protecting equipment, which if damaged, would result in significant core damage. This document indicates that the strategy must protect critical safety functions including the appropriate margin of safety. It is unclear the intent of "critical safety functions" and how the margin of safety is measured.

If there are any questions, please call at your convenience.

Very truly yours,

Stephen A. Byrne

SBR/SAB/sr

c: J. L. Skolds  
N. S. Cams  
T. G. Eppink  
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NSRC  
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