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June 13, 2003

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

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING  
REQUEST TO USE ALTERNATIVES TO ASME BOILER AND PRESSURE  
VESSEL CODE, SECTION XI, RELIEF REQUEST RR-II-13 (0-C-03-0883) TAC  
NO. MB8781

Reference: Stephen A. Byrne (SCE&G) Letter, RC-03-0074, to NRC (Document Control Desk), dated March 31, 2003, Request to Use Alternatives to ASME Boiler and Pressure Vessel Code, Section XI

South Carolina Electric & Gas Company (SCE&G) hereby submits the attached response to the subject request for additional information (RAI) regarding Relief Request RR-II-13.

This letter offers clarification to the referenced submittal letter for Relief Request RR-II-13. This submittal is in response to a telephone conversation between SCE&G, the NRC VCSNS Project Manager, and the NRC technical reviewer.

Should you have any questions, please call Mr. Mel Browne at (803) 345-4141.

Very truly yours,

Stephen A. Byrne

JT/SAB/dr  
Attachment

c: N. O. Lorick  
N. S. Carns  
T. G. Eppink (w/o Attachment)  
R. J. White  
L. A. Reyes  
K. R. Cotton  
K. M. Sutton

R. W. Bullard  
A. R. Caban  
NRC Resident Inspector  
NSRC  
RTS (0-C-03-0883)  
File (810.19-2)  
DMS (RC-03-0123)

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**South Carolina Electric & Gas Company (SCE&G)  
Virgil C. Summer Nuclear Station (VCSNS)  
Response to NRC Request for Additional Information (RAI)  
Regarding Inservice Inspection Relief Request  
RR-II-13**

**Relief Request to use Code Cases 573 and 600--(TAC NO. MB8781)**

- 1. The licensee should address the applicability of the Code Case 573 for special repair welding process (application of temperbead technique) specified in IWA-4500 of ASME Section XI. The licensee should ensure that each welder that is assigned to perform the temperbead repair is qualified in accordance with the received procedure qualification requirements.**

**Response 1:**

As noted in the submittal of March 31, 2003, SCE&G shall implement the requirements of Code Case N-573 for all processes, including the temperbead technique as described in IWA-4500, when applicable.

"The specific requirements listed in Code Case N-573 shall be met by the Owner that performed the procedure qualification, and by the Owner intending to use the PQR. These requirements are:

- (f) The Owner accepting the completed PQR shall demonstrate technical competence in application of the received PQR by completing a performance qualification test using the parameters of a resulting WPS."

- 2. The licensee should also clarify the applicability of the Code Case 600 for special repair welding process (application of temperbead technique) specified in IWA-4500 of ASME Section XI. The licensee should ensure that the welders are qualified in accordance with IWA-4512.2 or IWA-4522.2 of ASME Section XI when the repair weld is subjected to physical obstruction.**

**Response 2:**

As noted in the submittal of March 31, 2003, SCE&G shall implement the requirements of Code Case N-600 for all WPQ/BPQ qualifications, including the temperbead technique as described in IWA-4500, when applicable.

"The specific requirements listed in Code Case N-600 shall be met by the Owner who performed the qualification, and by the Owner intending to use the WPQ/BPQ. These requirements are:

- (d) The Owner accepting the WPQ/BPQ shall require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with QW-322.2(a) or QB-322 (b)."

**3. The quality assurance requirements are not specified in IWA-4142(a) of ASME Section XI, 1989 Edition.**

**Response 3:**

SCE&G submittal of March 31, 2003, presented requirements specified by Code Case N-600. In particular;

"The specific requirements listed in Code Case N-600 shall be met by the Owner who performed the qualification, and by the Owner intending to use the WPQ/BPQ. These requirements are:

- (h) The Owner accepting the WPQ/BPQ shall comply with the Quality Assurance requirements of IWA-4142(a)."

Per teleconference with the NRC on May 27, the NRC reviewer reiterated RAI question 3 stating that this requirement referenced an incorrect paragraph of the Code.

SCE&G proposes to amend this requirement to state:

The Owner accepting the WPQ/BPQ shall comply with the Quality Assurance requirements of IWA-4400.