



July 7, 2003
RC-03-0138

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

5/14/03
68 FR 25909
(2)

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
PROPOSED GENERIC COMMUNICATION; REQUIREMENTS FOR STEAM
GENERATOR TUBE INSPECTIONS (MAY 14, 2003, 68 FR 25909)

South Carolina Electric & Gas Company (SCE&G) submits the following comments on the subject proposed generic communication:

1. Current technical specifications allow for sampling and expanded sampling when tube degradation is detected. It should be clear in the generic letter that use of sampling plans is acceptable for determining the inspection scope for potential damage mechanisms and determining the extent of condition when tube degradation is identified. This should include sampling of a partial length of the tube. For example, if circumferential cracking in the expanded portion of tubing within the tube sheet is determined to be "potential", but has not been detected, a utility may choose to inspect a partial length of the tube within the tube sheet using a technique qualified to detect such degradation in accordance with the utility's approved sample plan.
2. The term "potential", or "potentially", is used frequently in the generic letter. It should be clear that these terms are equivalent to the term "potential damage mechanism", as defined in EPRI steam generator inspection and integrity assessment guidelines.
3. The staff should consider allowing utilities more time to submit the detailed report required by the requested information section of the generic letter. Thirty (30) days would be unreasonably taxing to most utilities, especially those with multiple damage mechanisms present. As an alternative, it may be appropriate to request that utilities provide a brief preliminary report within 30 days, with a longer term to provide a detailed follow-up report.

Template = ADM-013

ERTDS = ADM-03
All = J. S. Papaker (JWS)
P. Klein (PAK)

Should you have any questions, please call Mr. Jeffrey Pease at (803) 345-4124.

Very truly yours,



Stephen A. Byrne

JWP/SAB/dr

- c. N. O. Lorick
- N. S. Carns
- T. G. Eppink
- R. J. White
- L. A. Reyes
- K. R. Cotton
- K. M. Sutton
- Alexander Marion
- NRC Resident Inspector
- Document Control Desk
- NSRC
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