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Combined License Applications: Virgil C. Summer Nuclear Station Units 2 and 3; South Carolina Electric and Gas Company and South Carolina Public Service Authority

Comment On: NRC-2008-0441-0072

Virgil C. Summer Nuclear Station, Units 2 and 3; License Amendment Application

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General Comment

NRC-2008-0441

South Carolina Electric & Gas Company,

License # NPF-93 and 94 (Dockets # 052-027 and 028)--Virgil C. Summer Nuclear Station Units 2 and 3

The licensee submittal dated May 26, 2015 (ML15146A455) states in part (see page 3 of 17 of enclosure 1), AWS D1.1-1992 is not currently used (or planned for use) in the design of seismic Category I or seismic Category II structures.

This implies that the current design only includes 2000 STD and the new licensing basis going forward will be STD 2000 rather than 1992 for the subject welds.

However, the proposed changes to UFSAR Section 3.8.4.2 states,

AWS D1.1-2000 may be used in lieu of AWS D1.1-1992 for the design, qualification, fabrication, and inspection for AISC N690 applications

This statement is confusing in that it does not provide clear licensing basis for the subject welds. This statement implies that the current code of use is 1992 but you can use 2000 code and this is not true based on the current design. Moreover, down the road (from 10 years from now) when the licensee design engineer wants modify or revise this, he/she should have clear and crisp understanding of the licensing basis and the proposed change does not provide the clarity in the licensing basis. In addition, in one of the public meeting, the licensee stated that it wants to retain 1992 code as approved with the certified AP1000 design, If 1992 code is not used or will be used there is no reason to keep it. The revised licensing basis change with right code has no impact on the certified design, and other COL applicants can still use 1992 Code.

NO Significant Hazards Consideration discussion:

The licensee discussion for criterion 3, significant reduction in the margin of safety, does takes credit for testing performed by the industry and reported in a journal. It is my understanding that the NRC has not reviewed/accepted those test. Moreover, the licensee has not provided any justification indicating its applicability for Vogtle units 3 and 4. In addition, the licensee has not discussed and justified changes related weld configuration not covered by AWS-2000 standard and the licensee has not discussed these changes in No Significant Hazards Discussion section of the Licensee submittal for the proposed amendment. Therefore, the licensee determination for no significant hazards consideration required by 10 CFR 50.92(c) is flawed and incomplete.