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DOCKET NUMBER
PROPOSED RULE PR 50.52+100
(57 FR 47802)

March 24, 1993
Refer to: RC-93-0074

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Mr. Samuel J. Chilk
Secretary, U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON PROPOSED RULE CHANGE TO 10 CFR 100: REACTOR SITE
CRITERIA (NUM 920014)

South Carolina Electric & Gas Company (SCE&G) has participated with the NUMARC Seismic Ad Hoc Advisory Committee (AHAC) in the review of the proposed 10 CFR 100 Rulemaking package (contained in 57 FR 47802 and 57 FR 55601) and endorses the positions and comments submitted by NUMARC on behalf of the industry. In addition, SCE&G has the following supplementary comments on specific portions of the package.

A. DRAFT REGULATORY GUIDE DG-1016

1. The requirement for a free-field instrument may be useful from an academic standpoint, but it introduces numerous uncertainties in recorded ground motions which must be reconciled with the motions recorded inside plant structures. Recorded motions should be obtained at locations coinciding with the plant design input not at a free-field site which has no design basis for comparison. The requirement for a free-field instrument will impose an undue burden on licensees due to the time required for and the cost involved in the reconciliation process.
2. The number of seismic instruments specified in the Regulatory Guide is excessive, especially in light of industry initiatives and the NRC's concern for limiting radiation exposure and improving operation and maintenance of the instruments. Also, only a limited number of instruments should be used in order to simplify the comparison of recorded motions to the structural design models.

The number and location of instruments recommended by NUMARC appear to be reasonable and address most of these concerns. However, SCE&G recommends that a free-field instrument not be required as discussed in Comment 1.

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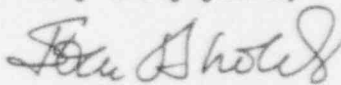
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B. DRAFT REGULATORY GUIDE DG-1017

1. The determination of Operating Basis Earthquake (OBE) exceedance should be based on the EPRI NP-5930 criterion as measured by an instrument located on the containment foundation, the location of the plant design input where a direct response spectrum comparison can be made. An instrument located in the free-field provides data that is not directly comparable to the plant design which can complicate/prolong the plant shutdown/restart decision and in general amplifies the recorded motions significantly over what the plant actually experiences.

If you have any questions, please call at your convenience.

Very truly yours,



John L. Skolds

ARR:lcd

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