

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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O. W. DIXON, JR.  
VICE PRESIDENT  
NUCLEAR OPERATIONS

June 28, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
NUREG 0588 Report Question

Dear Mr. Denton:

South Carolina Electric and Gas Company hereby provides a response to a question from the NRC staff concerning safety classification of the letdown line in the Chemical Volume and Control System (CVCS) as discussed in Revision 4 of our NUREG 0588 Report (see Attachment).

If you have additional questions, please let us know.

Very truly yours,



O. W. Dixon, Jr.

NEC:OWD,jr:lkf

Attachment

cc: V. C. Summer (w/o attach.)  
G. H. Fischer (w/o attach.)  
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T. C. Nichols, Jr. (w/o attach.)  
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File

B601

# ATTACHMENT

## Question:

The staff requested that the applicant provide justification why the letdown portion of the Chemical and Volume Control System (listed in Appendix D) is not considered safety-related. The applicant should review the applicability of Information Notice No. 79-22 and address the completeness of the safety-system lists with the above exemption.

## Response:

The letdown portion is considered as safety-related with respect to ASME Code requirements for the piping. It is assumed that the NRC staff is referring to Class 1E equipment designations. The letdown portion of the chemical and volume control system is required for only one (No. 2) of the following safety-related functions.

- 1) Emergency Reactor Shutdown
- 2) Containment Isolation
- 3) Reactor Core Cooling
- 4) Containment Heat Removal
- 5) Core Residual Heat Removal
- 6) Prevention of Significant Release of Radioactive Material to the Environment

As indicated, the letdown portion is only required to perform a containment isolation function for accident mitigation. The containment isolation valves are therefore considered safety-related and are designated as Class 1E. The following valves are involved.

8149 A, B, C (Inside Containment)  
8152 (Outside Containment)

These valves were reviewed and qualified under the NUREG 0588 Review. This is documented in Rev. 4 to the Virgil C. Summer NUREG 0588 submittal dated February 19, 1982.

SCE&G submitted the evaluation of Information Notice (IEN) 79-22 to the NRC on February 26, 1982. This submittal addressed both environmental interaction and control system failures. In synopsis, the evaluation determined that Chapter 15 of the FSAR adequately bounded the consequences of such failures. SCE&G does not consider it necessary to re-evaluate the classification of the letdown system components based upon the above information. Therefore, the safety-system lists are considered to be complete and accurate.