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July 26, 1994
Refer to: RC-94-0194

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
ASME SECTION XI RELIEF REQUEST (NRR 940004)

South Carolina Electric & Gas Company (SCE&G) hereby requests relief from the ASME Section XI requirements for Class 1, 2, and 3 insulated pressure retaining bolted connections which receive VT-2 Visual Examination during the performance of System Pressure Testing.

Attachment I contains the component identification, code requirements, proposed alternative testing, and basis for this relief request. This relief request is for Class 1, 2, and 3 pressure retaining bolted connections that are insulated, in systems borted for the purpose of reactivity control. Specifically, SCE&G requests the option to exempt the applicable connections from the requirement of ASME Section XI IWA 5242(a), which specifies that insulation must be removed from pressure retaining bolted connections for VT-2 visual examination during the performance of System Pressure Testing.

As an alternative test, SCE&G shall remove the insulation and conduct the VT-2 visual examination of pressure retaining bolted connections at least once each inspection period during a refueling outage at reduced or zero pressure. In addition, the remaining requirements of IWA-5242 will still be conducted during the required System Pressure Test without removing the insulation.

SCE&G contends that the proposed alternative testing provides the equivalent, acceptable level of quality and safety as that provided by the Code.

SCE&G requests that the NRC review and approve this relief request as soon as possible, but not later than September 1, 1994, in order to support inspection activities scheduled to begin in September 1994.

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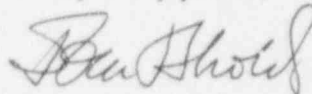
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SCE&G desires relief from the above requirements so as not to create an undue hardship without a compensating increase in quality or safety.

Should you have any questions, please call Mr. M. J. Zacccone at (803) 345-4328.

Very truly yours,



John L. Skolds

MJZ:lcd
Enclosure

c: O. W. Dixon
R. R. Mahan (w/o Attachment)
R. J. White
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NSRC
Central File System
RTS (NRR 940004)
File (810.19-2)

RR-06

BOLTED CONNECTIONS ISI RELIEF REQUEST

SYSTEM:

All code class systems.

COMPONENTS:

Insulated Class 1, 2, and 3 pressure retaining bolted connections in systems which are borated for the purpose of reactivity control.

REQUIREMENT:

ASME Section XI IWA-5242(a) requires that for systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2. This requirement specifies that insulation must be removed from pressure retaining bolted connections for VT-2 visual examination during the performance of System Pressure Testing.

ALTERNATE TEST:

Remove the insulation and conduct the VT-2 visual examination of pressure retaining bolted connections at least once each inspection period during refueling outage at reduced or zero pressure. In addition, the remaining requirements of IWA-5242 will still be conducted during the required System Pressure Test without removing the insulation.

BASIS FOR RELIEF:

The current Code requirement specifies that insulation must be removed from pressure retaining bolted connections for VT-2 visual examination during the performance of System Pressure Testing. For the Reactor Coolant System, portions of the Charging and Volume Control System, and the Safety Injection System this testing is performed just prior to start-up at the required system pressure and temperature. This would require the removal and restoration of the insulation on approximately 65 system components with operating temperatures of between 200°F and 650°F. The removal and restoration of insulation with the associated components at normal operating temperatures is considered extremely hazardous to personnel, has the potential to add up to two days to the critical path of the refueling outage, result in additional personnel exposure, and is considered impractical when compared to the Alternative Testing. The performance of the required VT-2 visual examination of insulated Class 1, 2, and 3 pressure retaining bolted connections with the insulation removed and the associated system at reduced or zero pressure is of equal value as the required testing of IWA-5242(a). This is because evidence of any previous leakage at normal operating temperature and pressure will be shown by the presence of boric acid residues. This will allow the scheduling of insulation removal and VT-2 examination of pressure retaining bolted connections throughout the refueling outage. This will enhance personnel safety for this activity, reduce exposure, and reduce the impact this activity will have on critical path. The proposed alternative testing provides an acceptable level of quality and safety as that proposed by the Code.