



DOCKET NUMBER  
PROPOSED RULE PR 50  
(56FR03796)  
South Carolina Electric & Gas Company  
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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. Samuel J. Chilk  
Secretary of the Commission  
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 THE PROPOSED RULE TO 10CFR50.55a (PR 910003)

South Carolina Electric & Gas Company (SCE&G) has reviewed the proposed rule to 10CFR50.55a (reference 56 Federal Register 3796) endorsing later addenda and editions of ASME Code Sections III and XI. SCE&G supports the endorsement with the exceptions noted. SCE&G also endorses the comments submitted by the Nuclear Management and Resources Council (NUMARC).

SCE&G considers that 10CFR50 Appendix J provides an adequate basis for testing containment isolation valves and limiting leakage. SCE&G implements Appendix J by establishing conservative leakage limits by valve type to ensure total containment leakage is significantly below the allowable limit. Valves with leakage approaching/exceeding the conservative limit are repaired as soon as practical. By this means, total leakage is maintained significantly below the Appendix J allowable value. The proposed rule would require immediate repair or replacement of a valve exceeding the licensee defined limit. This is considered too restrictive, based on the conservative limits already in place. In order to provide the needed flexibility, SCE&G's very conservative limits would be raised to a value closer to the ASME OMA-1988 permissible leakage rate. We believe this would result in actual containment leakage rates greater than what is allowed in our current program.

The reference to Position 11 of Generic Letter 89-04 (testing of non-code components) in the Supplementary Information section of the rule is confusing since 10CFR50.55a deals with ASME Class 1, 2, and 3 pumps and valves. Non-code pumps and valves and the associated piping are not usually designed to meet the requirements of ASME Section XI. SCE&G supports the NUMARC position that ASME Section XI test requirements should not be linked to non-code pumps and valves.

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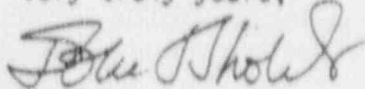
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SCE&G considers the present snubber testing and inspection requirements of Technical Specifications (with the provisions of Generic Letter 90-09) and ASME Section XI 1977 Edition to be more than adequate. The requirements of the revision of OM-4 (OM-1987, Part 4; now ISTD) endorsed under the proposed rule would result in a significant manpower expenditure and radiation exposure with no identifiable increase in any margin of safety. SCE&G does support ISTD Revision 7 as a replacement for the applicable Technical Specification and current ASME Section XI requirements for snubber testing and inspection.

If you have any questions concerning these comments, please call.

Very truly yours,



John L. Skolds

ARR:JLS:lcd

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NUMARC  
General Managers  
NSRC  
RTS (PR 910003)  
File (811.02, 50.002F)