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John L. Skolds
Senior Vice President
Nuclear Operations

September 20, 1994
Refer to: RC-94-0245

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 940001 Supplement I)

Refer to: John L. Skolds to Document Control Desk Letter dated March 28, 1994
(RC-94-0092)

Pursuant to a telephone conversation on September 14, 1994, South Carolina Electric & Gas Company (SCE&G) desires to revise a relief request previously submitted in the above referenced letter.

The relief request pertains to bolting examinations (VT-3) following bolted connection leakage occurring during a System Pressure Test. The revised relief request is based on the 1992 edition of the ASME Boiler & Pressure Vessel Code, Section XI, and is very similar to a relief request granted to Arkansas Nuclear One, Unit 2, Docket No. 50/368, dated December 13, 1993.

SCE&G requests relief from the code requirements so as to not create an undue hardship without a compensating increase in safety.

Should you have any questions, please call Mr. Philip Rose at (803) 345-4052 at your convenience.

Very truly yours,

John L. Skolds

PAR:lcd
Attachment

c: O. W. Dixon
R. R. Mahan (w/o Attachment)
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NSRC
Central File System
RTS (NRR 940001)
File (810.19-2)

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IST RELIEF REQUEST

Subject: Bolting examination (VT-3) following bolted connection leakage occurring during a System Pressure Test.

Component Identification: All bolting associated with Class 1, 2, and 3 connections which receive VT-2 Visual Examination during the performance of System Pressure Testing.

Code Requirements: If leakage occurs at a bolted connection, the bolting shall be removed, VT-3 visually examined for corrosion, and evaluated in accordance with IWA-3100. (IWA-5250(a)(2) Corrective Measures)

Alternative If leakage occurs at a bolted connection, one of the bolts shall be removed, VT-3 examined, and evaluated in accordance with IWA-3100. The bolt selected shall be the closest to the source of leakage. When the removed bolt has evidence of degradation, all remaining bolting in the connection shall be removed, VT-3 examined, and evaluated in accordance with IWA-3100. (IWA-5250(a)(2) 89 Code 90 Addenda, Corrective Action)

Basis for Relief: A literal interpretation of the wording of the 1989 Edition without addenda, which is the applicable edition of Section XI of the ASME Code for the second ten year Inservice Inspection interval, requires complete removal of all bolts for evaluation if leakage occurs at a bolted connection during system pressure testing. Operating under such an interpretation could lead to unnecessary cooldown of the plant (i.e., should a minor leak be made worse), unnecessary radiation exposure of plant maintenance and inspection personnel, and significant delays in plant startup following a refueling outage should non-degraded bolts be required to be removed. The revised wording in the 1990 addenda provides relief to the current restrictions in that it limits complete disassembly of a bolted connection to cases where degradation of a single bolt has been demonstrated by VT-3 examination. The revised wording from the 1990 Addenda has remained unchanged in the 1991 Addenda to the 89 Code and the 1992 Edition of the Code.