

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

April 13, 1983

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
Operating License No. NPF-12
NUREG-0966

Reference: Letter from Mr. O. W. Dixon to
Mr. H. R. Denton, "Operating
License Condition 2.C.14,"
February 14, 1983

Dear Mr. Denton:

This letter is provided in response to NUREG-0966, "Safety Evaluation Report related to D2/D3 Steam Generator Design Modification," of March 1983. Based on a review of this NUREG, the following supplemental information is being provided as input to the Virgil C. Summer Nuclear Station plant specific Safety Evaluation Report. Section 3.8 of the NUREG, regarding Inservice Inspection and Testing, describes additional testing and surveillance requirements beyond those proposed in the referenced submittal. These additional requirements involve Eddy Current Testing (ECT), Visual Examination of the Manifold, and Loose Parts Monitoring.

In view of the NRC concerns and the position stated in NUREG-0966, some changes to the previously proposed inservice inspection program, as described in the referenced letter, are recommended. These changes include the following:

1. The addition of the plant's first inservice inspection, as defined in the plant Technical Specifications, to the Design Review Panel (DRP) Report recommended preheater section inspection.
2. The ECT of a minimum of 240 tubes total in the preheater section of all steam generators during the first and second inservice inspection.

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3. Performing an additional visual examination of the accessible portions of the manifold internal areas during the second ECT inspection.

It is felt that the recommendations contained herein are adequate to ensure the quality and integrity of the steam generator modification and that this inspection/examination program should be separate from that in the unaffected region of the steam generators.

Attachment 1 to this letter, which is provided as an alternative to the ECT Program described in the subject NUREG, includes proposed wording for the forthcoming change to the Technical Specifications concerning the ECT Program.

A more detailed scope of the proposed Visual Examination program beyond that described in the referenced letter has not been defined due to the "first of a kind" nature of the examination. As field experience with these examinations increases, a more specific examination scope can be determined. Every effort will be made to perform the examinations in accordance with the ASME Code, Section XI, IWA-2211 Visual Examination VT-1; however, because of limited accessibility, some flexibility is needed in performing these examinations that the Code does not allow.

The data obtained from the ECT inspections and visual examinations outlined above, along with ALARA considerations, will be used to determine the scope and nature of further inspections or examinations deemed appropriate.

In reference to a Loose Parts Monitoring Program to detect a structural failure of the manifold, the plant's installed Digital Metal Impact Monitoring System will be operated and maintained in accordance with Technical Specifications 3.3.3.10 and 4.3.3.10. Any structural failure of a manifold, which results in loose parts, should be detected by the system transducers located on the associated steam generator.

The feedwater system modification, as described in the referenced submittal, is being installed with the exception of minor hardware and control changes. A simplified diagram of the feedwater modification is attached as Figure 1 and reflects the deletion of the check valve in the forward flushing line. No other piping changes have been made to the

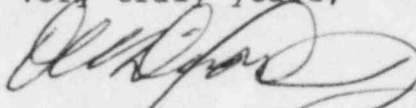
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design as described in the referenced submittal. The forward and reverse flushing temperature and flow permissives for the Feedwater Isolation Valve operation will be incorporated administratively. Concerning the piping associated with the feedwater modification, piping break blowdown, as well as pipe whip, jet impingement and reactive forces were basic design considerations. The design will be evaluated to ensure that present FSAR commitments and considerations will not be changed or omitted. The final, as built, configuration of the feedwater system modification and its associated operating criteria and limitations will be evaluated in accordance with 10CFR50.59 to determine that an unreviewed safety question does not exist prior to plant startup.

In addition to information provided in this letter, a separate letter is being submitted for a proposed Technical Specification change to add the containment isolation valves in the reverse flushing lines to Table 3.6-1.

If you have any questions, please advise.

Very truly yours,



O. W. Dixon, Jr.

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