

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

May 3, 1983

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

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
Steam Generator Modification
OL Conditions 2.C(14) and 2.C(32)
Reference: Letters from Mr. O. W. Dixon
to Mr. H. R. Denton, dated
February 14, 1983 and
April 13, 1983

Dear Mr. Denton:

In the referenced correspondence, South Carolina Electric & Gas Company (SCE&G) documented our position regarding the additional testing and monitoring, etc., required as a result of the modification to the model D3 steam generators. The programs discussed in the areas of loose parts monitoring and monitoring of feedwater inlet pressure oscillations remain as discussed in our April 13, 1983 and February 14, 1983 letters, respectively. However, to address additional NRC staff concerns and to expedite staff review of our program, the following changes and clarifications are provided.

- 1) Eddy Current Testing (ECT) - The Eddy Current Testing will be conducted as suggested in NUREG 0966 dated March, 1983. Specifically, the first inservice inspection after approximately six effective full power months shall include the technical specification 3% random sample inspection plus inspection of rows 45 - 49, all columns, in all steam generators as a minimum. Subsequent ECTs will be in accordance with the technical specifications plus an additional 240 tubes total, in the preheater sections of all steam generators.
- 2) Visual Inspections - The manifolds shall be visually inspected whenever Eddy Current Testing required by technical specifications is performed. The primary inspection tool will be a fiberoptic boroscope or equivalent. Every effort will be made to perform the examinations in accordance with the ASME Code, Section XI, IWA-2211 visual examination VT-1.

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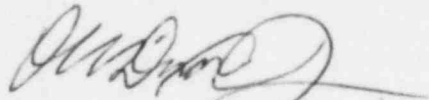
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- 3) Accelerometer Data - Tube vibration monitoring, using installed accelerometers (if operable) shall be conducted at power levels of approximately 0%, 30%, 50%, 65%, 75%, 90% and 100% during the initial power ascension to 100% power and at approximately 100% power after approximately three effective full power months of operation after the modification.
- 4) Inlet Pressure Monitoring - As noted previously, initial monitoring of feedwater pressure oscillations will be as discussed in our letter of February 14, 1983. The feedwater pumps are the principle contributor to the feedwater pressure oscillations and feedwater pump alignment changes represent the most significant transients on these pressure oscillations. Feedwater pump alignment changes will be made during power escalation in accordance with normal operating procedures.
- 5) ALARA Considerations - SCE&G shall provide a final report to the NRC concerning radiological dose received during the modification effort including a summary of the occupational dose received by major task and a comparison of estimated doses with the doses actually received.

The information included and referenced in this submittal is provided to meet the requirements of operating license conditions 2.C(14) and 2.C(32).

If you have any questions, please advise.

Yours very truly,



O. W. Dixon, Jr.

AP:OWD:tdh/fjc

cc: See Page #3

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cc: V. C. Summer
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