

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

May 16, 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
Generic Letter 82-33
Back-up EOF

Ref: (1) Mr. O. W. Dixon letter to
H. R. Denton dated
November 24, 1982
(2) Mr. O. W. Dixon letter to
H. R. Denton dated
April 15, 1983

Dear Mr. Denton:

NRC Generic Letter 82-33 requires a backup Emergency Operations Facility (EOF) to be located within ten (10) to twenty (20) miles of the plant site when a primary EOF is located within zero (0) to ten (10) miles. South Carolina Electric and Gas Company (SCE&G) has its primary EOF located approximately two and sixth tenths (2.6) miles south of the plant. In the referenced letters, SCE&G requested NRC approval for not having a backup EOF. This was denied in Mr. Eisenhut's letter dated April 25, 1983.

The Corporate Office of SCE&G is located in Columbia, South Carolina approximately twenty-five (25) miles south of the plant. SCE&G proposes this facility as a backup EOF. This facility has the advantage of adequate communication equipment, meeting rooms and offices. Located at this facility are personnel of the Nuclear Engineering, Nuclear Licensing, Quality Assurance, Nuclear Training, Nuclear Security, Emergency Planning, Corporate Health Physics and Environmental Programs, and Nuclear Fuel Management Groups plus SCE&G upper management. Appropriate documentation including drawings, schematic diagrams, procedures, emergency plans, etc., are readily available. Arrangements for portable backup

Boo!

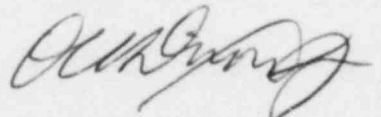
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equipment, coordination with offsite authorities and a continuity of dose projection and decision making capability will be provided.

SCE&G feels the advantages discussed above are adequate justification to locate the backup EOF a short distance [five (5) miles] outside the twenty (20) mile distance required in Generic Letter 82-33. Accordingly, we request an exemption from that requirement.

Please respond to our request at your earliest convenience.

Very truly yours,



O. W. Dixon, Jr.

NEC:RBC:OWD/fjc

cc: V. C. Summer
T. C. Nichols, Jr./O. W. Dixon, Jr.
E. H. Crews, Jr.
E. C. Roberts
H. N. Cyrus
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Group/General Managers
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