

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

August 9, 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  
ASME Section XI  
Hydrostatic Testing of  
Feedwater System

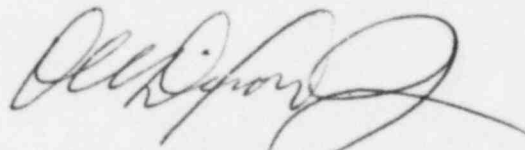
Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) hereby requests relief from the ASME Code/Section XI hydrostatic testing requirements for the Virgil C. Summer Nuclear Station Unit No. 1 Feedwater System. Details of this relief request are contained in the attachment to this letter.

This relief request is needed to support the Feedwater modification which is scheduled to commence October 15, 1983. It is requested that this relief be granted as soon as possible, but no later than September 15, 1983. Also attached is a check for \$4000 pursuant to the requirements of 10CFR170.

If you have any questions, please call us.

Very truly yours,



O. W. Dixon, Jr.

SHB:OWD:tdh

Attachment

cc: See Page Two

A047

Rec'd w/o  
check

1/1

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cc: V. C. Summer  
E. H. Crews, Jr.  
T. C. Nichols, Jr./O. W. Dixon, Jr.  
E. C. Roberts  
H. N. Cryus  
J. P. O'Reilly  
Group/General Managers  
O. S. Bradham  
R. B. Clary  
C. A. Price  
A. R. Koon  
C. L. Ligon (NSRC)  
G. J. Braddick  
J. C. Miller  
J. L. Skolds  
J. B. Knotts  
NPCF  
File (Lic./Eng.)

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SYSTEM PRESSURE TESTING RELIEF REQUEST

SYSTEM

(FW) Feedwater System

CODE CLASS

2

SYSTEM DRAWING NUMBER

D-302-083

SYSTEM FUNCTION

The Feedwater System provides a flow path for water to the Steam Generators (S/G) where such water absorbs and removes heat from the Reactor Coolant System.

SYSTEM MODIFICATION

SCE&G intends to install a 2" socket welded inspection port in the main feedwater piping. This will provide access for the necessary visual inspection of the recently installed steam generator preheater baffle. This access location will utilize an existing 2" half coupling which is presently plugged (this is an existing gamma ray port for radiography). Design and installation will be in accordance with the ASME code, Section XI, 1977 Edition through and including Summer 1978 Addenda.

SYSTEM TEST REQUIREMENT

Subsequent to repairs or modifications by welding which penetrate the pressure boundary on piping greater than one inch diameter, conduct a hydrostatic test on piping where such repairs or modifications were performed.

Pursuant to ASME Code, Section XI, 1977 Edition through and including Summer 1978 Addenda, hydrostatic test pressure is 1.25 Psv or 1470 PSI where Psv is the lowest pressure setting among the main steam safety valves.

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#### BASIS FOR RELIEF

Performing the required hydrostatic test on the Feedwater piping subsequent to the modification would be extremely difficult, impractical, and expensive due to the following:

1. The inability to maintain pressure due to potential leakage through the Feedwater Isolation Valves, Main Steam Isolation Valves, and other valves connected to the system.
2. Additional time and effort to pin or block main steam constant support and variable spring hangers.
3. Additional time and effort to remove the Main Steam Safety Valves and blank the inlet piping.
4. Potential for placing excess stress on the Steam Generator shells.
5. Potential for damage to system instrumentation, or considerable time delay due to additional time and effort expended to isolate or remove instrumentation.
6. Potential for damage to the Main Steam System and its hangers due to static loads caused by water solid condition.
7. Potential for damage to Steam Generator tube bundles.
8. Isolation and preparation of this system would result in additional radiation exposure to personnel.
9. In addition to the above eight (8) reasons, the alternate examinations specified will provide a level of confidence and quality equal to or better than the required testing per the ASME Code.

#### ALTERNATE EXAMINATIONS FOR MAIN FEEDWATER PIPING WELDS

Prior to declaring the Feedwater System operable, the following examinations will be performed to the affected Feedwater System piping welds -- except for Item 4, which will be completed at the end of the First Inservice Inspection Interval:

1. MT Examination on the root pass and final weld surface pursuant to ASME Code Section V, Article 7.

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2. Visual Examination.
3. Perform Inservice Leak Test at nominal operating pressure.
4. Perform Hydrostatic Test at the end of the 10 Year Interval.

#### IMPLEMENTATION

The alternate examinations will be performed in accordance with approved written procedures by qualified personnel after the Feedwater Modification and before the system is declared operable.