

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

January 7, 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 82-32
Steam Generator Generic
Requirements

Dear Mr. Denton:

As requested by NRC Generic Letter 82-32, South Carolina Electric & Gas Company (SCE&G) hereby provides comments on the draft final report, prepared by Science Applications, Inc. (SAI) for the NRC, of the Value-Impact Analysis of Recommendations Concerning Steam Generator Tube Degradations and Rupture Events.

From an overall standpoint SAI's analysis appears reasonable in estimation of relative effectiveness, and exposure rates. However, cost estimates are rough and certain statements in the executive summary section point out inconsistencies in the NRC position on these issues.

Cost estimates could have been provided in the form High \$ - Low \$ band with a percent confidence factor. In addition, only direct costs are considered. Indirect costs such as radiation exposure, HP coverage, decontamination facilities, security forces, low level waste disposal, reproduction of reports and NRC submittals are not addressed.

On page ES-2 it is stated that "public risk from steam generator tube rupture was assessed and found to be so low that it has a completely negligible contribution to the value impact comparisons." Based on this statement, a steam generator tube rupture event does not pose a justifiable detriment to the public health and safety; therefore, NRC research and investigation of this issue should be reevaluated.

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Additionally, as discussed on page ES-4, item 4, installation of upper inspection ports was noted as being ineffective, or marginally effective at best, with a negligible net cost benefit. This is in contrast with the NRC position for the Operating License for the Virgil C. Summer Nuclear Station. License Condition 2.C.13 requires installation of upper inspection ports by the first refueling outage, despite our submittals (dated June 8, 1981 and August 17, 1982), which demonstrate the ineffectiveness of this modification.

In summary, SAI's analysis appears to be generally accurate in most areas. We note, also, that the analysis points out contradictions in NRC positions which should be corrected.

We appreciate the opportunity to comment on these issues.

Very truly yours,



O. W. Dixon, Jr.

NEC:OWD/fjc

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