

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

December 30, 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
Steam Generator Inspection Ports
License Condition 2.C.13

Dear Mr. Denton:

In letters dated June 8, 1981 and August 17, 1982, South Carolina Electric and Gas Company (SCE&G) discussed its position regarding the Staff's requirement to install ports for visual inspection in the "U" bend area of the steam generators at the Virgil C. Summer Nuclear Station. SCE&G was originally notified of this requirement by letter dated April 21, 1980. It later appeared in the Station's Safety Evaluation Report (SER) and is now included as Condition 2.C.13 in the Operating License requiring completion prior to start-up after first refueling. That refueling is currently scheduled to occur no later than the early fall of 1984.

The stated purpose for the installation of these inspection ports was to provide a means for monitoring tube and support plate degradation within the steam generator caused by denting. The denting phenomenon has historically first occurred on the hot leg side of the steam generator and progressed from the lower tube support plate (TSP) of the generator to the top TSP. Denting is evidenced by restriction of the tube at TSP intersections and by flow slot hourglassing at the TSP. The progression of denting to the point where it would be detectable by visual inspection through an inspection port above the top TSP, would occur long after denting would be detectable in the lower TSP region by eddy current inspection or by visual inspection through the existing lower inspection ports. Installation of inspection ports also reduces the physical integrity of the secondary boundary and unnecessarily increases the potential for leakage. It is our position that the installation of these ports to monitor denting on Model D-3 Westinghouse steam generators will not satisfy the Staff's concerns and is unnecessary.

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We are aware the NRC is in the process of reviewing a number of generic steam generator requirements, one of which is the installation of inspection ports. Based on our discussions with the Staff, it is our understanding that the decision on our requests made in 1981 and 1982 for removal of the requirement to install inspection ports will be made pending a Commission decision on the generic steam generator requirements. An early decision is essential to avoid a difficult situation in scheduling the required engineering and procurement activities necessary for implementation should this requirement not be removed. Under normal circumstances, preparatory work for such a modification would already be underway. Your immediate attention to this matter is solicited.

If you have any questions, please advise.

Very truly yours,



O. W. Dixon, Jr.

MBW:OWD:epm

cc: V. C. Summer	C. L. Ligon (NSRC)
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