

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

January 27, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
First Interval Inservice
Inspection Program

Dear Mr. Denton:

At the present time, South Carolina Electric and Gas Company (SCE&G) conducts inservice inspection in accordance with the ASME Boiler and Pressure Vessel Code, 1977 Edition through and including the Summer 1978 Addenda. This Code stipulates the use of an Authorized Inspection Agency as outlined in IWA-1400, Paragraph (f) of ASME Section XI.

Virgil C. Summer Nuclear Station is requesting exception to the requirements of IWA-1400, Paragraph (f), "contract with an Authorized Inspection Agency".

The reasons for this exception are as follows:

- a) The State of South Carolina has never enacted a Boiler and Pressure Vessel law; therefore, South Carolina does not require the use of an Authorized Inspection Agency.
- b) Certain activities (weld repairs) require Authorized Nuclear Inspector (ANI) review and approval prior to declaring the "system" operable. Since the ANI does not reside at the Virgil C. Summer Nuclear Station it is a burden on SCE&G to hold up completion of weld repairs until the ANI makes arrangement and actually travels to the Plant.
- c) The duties of the ANI as described in IWA-2120, of ASME Code Section XI are time consuming and costly with no improvement in the quality or safety of those items since his activities are a duplicate of those being performed by Plant QC, QA and ISI personnel.

Boo!

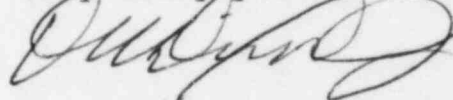
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In lieu of having the ANI witness or otherwise verify the required examinations, tests, and repairs, Virgil C. Summer Nuclear Station personnel familiar with such activities will either witness or otherwise verify the captioned examinations, tests, and repairs.

Unless otherwise informed, these changes as described above will be included in Revision 2 of the First Interval Inservice Inspection Program, which is planned to be submitted by May 1, 1983.

Should there be any questions, please let us know.

Very truly yours,



O. W. Dixon, Jr.

RBC:ARK:OWD:dwf/fjc

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