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April 26, 1995
Refer to: RC-95-0103

11008
60FR15799
03/27/95
T. Scarbrough
A. Kugler

Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON PROPOSED NRC GENERIC LETTER 95-XX: PRESSURE
LOCKING AND THERMAL BINDING OF SAFETY-RELATED POWER-
OPERATED GATE VALVES

South Carolina Electric & Gas Company (SCE&G) has the following comments to the proposed Generic Letter and request they be addressed prior to issuance.

1. The full backfit analysis should be performed. This would identify the benefits to enable the utilities to perform a cost/benefit analysis to be utilized in response to the proposed actions.
2. The time frames recommended in the generic letter appear to be extremely optimistic. The scope of the generic letter is potentially as large as that of Generic Letter 89-10 which required a number of years to complete. Based on the potential scope of this issue, the identification of valves could be completed within 180 days but the evaluations and documentation required for each valve could take much longer. This is especially true when you consider that every valve must have documentation for every mode of operation to include testing configurations. There are literally hundreds of different test procedures with associated valve alignments which would potentially be affected. It is suggested that the Generic Letter allow each licensee to submit a schedule for completion of required actions depending on the individual scope of the work required.
3. The proposed Generic Letter should state that power operated gate valves whose safety function is fulfilled in the closed position are exempt from the requirements for evaluation and documentation.
4. The applicability of the Generic Letter should be clearly worded such that evaluations are required for **operational configurations within the design bases.**

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PDR I&E
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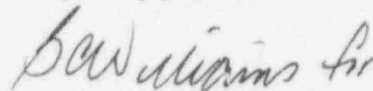
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5. The proposed generic letter appears to be an unnecessary regulatory burden. The pressure locking and thermal binding issues related to gate valves is well documented and being addressed under Generic Letter 89-10. The inclusion of air-operated and hydraulically operated gate valves appears to be unwarranted based on industry events.

SCE&G appreciates the opportunity to provide comments on this draft generic letter.

Very truly yours,



Gary J. Taylor

JWP/GJT/nkk

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RTS (TR 950011)
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