

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

May 1, 1984

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
Inservice Inspection Program

Dear Mr. Denton:

South Carolina Electric & Gas Company submits the following changes to the Pump and Valve Inservice Inspection Program for the Virgil C. Summer Nuclear Station. These changes will be added to the next revision of the Inservice Inspection Program to be submitted at a later date. The change summary of the new revision will reference this letter when detailing changes to the valves identified below.

1. Valves XVG-1678A-FW, XVG-1678B-FW, and XVG-1678C-FW are added to the Inservice Inspection Program as Category B valves. The valves are being added to the Inservice Inspection Program as a result of a recent modification which added a containment isolation signal to these valves. A relief request to perform stroke testing of the valves only during cold shutdown in lieu of quarterly is also attached.
2. Valves XVG-3103A-SW and XVG-3103B-SW are downgraded from active Category "B" to passive Category "B" and are being deleted from the Inservice Inspection Program. These valves remain open during both normal and emergency plant operations. In addition, the closed loop Service Water piping inside containment and within the penetration barriers is designed in compliance with GDC 1, 2, and 4 requirements. The monthly surveillance on valve position will continue and the valves will be included in the preventive maintenance program for stroke testing every refueling outage.

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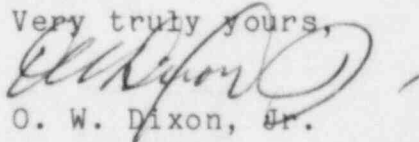
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3. Valves XVG-3106A-SW, XVG-3106B-SW, XVG-3110A-SW, and XVG-3110B-SW are downgraded from active Category "A" to active Category "B" and will no longer be Type "C" leak tested as described in 10CFR50, Appendix J. These valves do not meet any of the criteria specified in Appendix J for valves requiring Type "C" leak testing. In addition, during normal and post accident conditions, the Service Water fluid system penetrating the containment is always full of liquid and maintained at a pressure in excess of the maximum containment pressure during post accident conditions.

If there are any questions, please call us at your convenience.

Very truly yours,


O. W. Dixon, Jr.

ARK/OWD/dwf/gj
Attachment:

cc: (w/o attachment): V. C. Summer
T. C. Nichols, Jr./O. W. Dixon, Jr.
E. H. Crews, Jr.
E. C. Roberts
W. A. Williams, Jr.
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File

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R E L I E F R E Q U E S T

SYSTEM: FEEDWATER (FW)

D.3	VALVE(S):	XVG-1678A, XVG-1678B, XVG-1678C
	CATEGORY	B
	CLASS	2a
	FUNCTION	Allow reverse flush of steam generators during plant startup.
	TEST REQUIREMENTS:	Exercise valves (full stroke) for operability every three (3) months.
	BASIS FOR RELIEF:	These valves are closed during power operation, and their required safeguards position is also closed. These valves are only open for a brief period of time during plant startup to minimize thermal transients on the steam generators. Testing these valves during plant operation could potentially cause an upset in the associated steam generator level which could result in a reactor trip. Also, steam generator blowdown would have to be secured during the testing of these valves. This is undesirable due to steam generator chemistry concerns.
	ALTERNATE TEST	Valves will be tested during cold shutdown.

ATTACHMENT