

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

October 9, 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  
ASME Section XI Relief Request  
Inservice Inspection Program

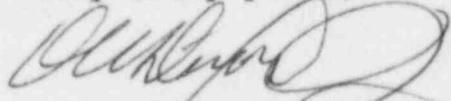
Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) hereby requests relief from the ASME Code Section XI 1977 Edition requirement for output frequency response of Eddy Current (ET) instruments used as specified in Appendix IV, Article IV-2000, paragraph IV-2100 (b). Details of this relief request are contained in the attachment to this letter.

SCE&G has scheduled Eddy Current Testing to be conducted during the Fall 1984 refueling outage to fulfill inservice inspection requirements found in the Steam Generator Technical Specifications.

If you have any questions, please advise.

Very truly yours,



O. W. Dixon, Jr.

AMM/OWD/gj  
Attachment:

cc: V. C. Summer  
T. C. Nichols, Jr./O. W. Dixon, Jr.  
E. H. Crews, Jr.  
E. C. Roberts  
W. A. Williams, Jr.  
D. A. Nauman  
J. P. O'Reilly  
Group Managers  
O. S. Bradham

C. A. Price  
C. L. Ligon (NSRC)  
K. E. Nodland  
R. A. Stough  
G. Percival  
C. W. Hehl  
J. B. Knotts, Jr.  
NPCF  
File

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ATTACHMENT

CODE CLASS 1 NDE RELIEF REQUEST

Component: Steam Generator Tubing

Relief Request Number: 1-S/G-2

Component Sketch Isometric and Weld Number: NA

Examination Requirement:

ASME Section XI 1977 Edition, Appendix IV, Article IV-2000, paragraph IV-2100(b) requires "the outputs from the ET instrument shall provide phase, amplitude, and/or in-phase and quadrature information with a minimum frequency response of d-c to 100 Hz constant  $\pm 2\%$  of full scale."

Justification for Relief:

Present ET instrument technology does not meet the ASME Code Section XI 1977 Edition specified minimum output frequency response requirement of  $\pm 2\%$  over the specified range. ASME Section XI 1980 Edition through Winter 1980 Addendum now references ASME Section V for ET instrument requirements. Section V relaxes the  $\pm 2\%$  of full scale requirements to  $\pm 15\%$  over the same range.

The ET systems to be utilized by SCE&G are either the Zetec MIZ-12 or the Zetec MIZ-18. These ET instruments have a frequency response d-c to 100 Hz of  $\pm 5\%$  of full scale.

Alternative Examination

In lieu of the ET instrument requirements of the ASME Section XI Code to which SCE&G is committed, the requirements of ASME Section Code V 1977 through Winter 1978 Addendum, Article 8 - Appendix I, paragraph I-21(b), are invoked. This reference permits the ET instrument frequency response to be "flat,  $\pm 15\%$  of full scale from d-c to 100 Hz."