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57 FR 27394

6/19/92

USNRC
OFFICE OF ADMINISTRATION

September 29, 1992

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Mr. David L. Meyer
Chief, Rules and Directives Review Branch
Division of Freedom of Information
and Publications Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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Dear Mr. Meyer:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
REVIEW OF REACTOR LICENSEE REPORTING REQUIREMENTS
57 FR 27394 (June 19, 1992) (PR 920027)

South Carolina Electric & Gas Company (SCE&G) has reviewed the reporting requirements for licensees as requested in 57 FR 27394 and provides the following comments:

- 1) Regulatory Guide 1.21 (10CFR50.36a and Technical Specification 6.9.1.8) reporting should be revised from semiannual to annual.
- 2) The Regulatory Guide 1.21 report for solid waste should be eliminated when the NRC implements the uniform manifest system for radwaste shipments. The uniform manifest system will require computerized reporting as shipments are made. Sending solid waste totals under Regulatory Guide 1.21 will result in duplicate reporting.
- 3) 10CFR20.407 reporting should be consolidated with the Annual Operating Report requirement of Regulatory Guide 1.16 (Technical Specification 6.9.1.5).
- 4) The 15 day Technical Specification 4.4.5.5 report on the number of steam generator tubes plugged or repaired should be deleted. This information is not required prior to startup and is subsequently provided in the report issued 12 months after the inspection work is complete. The 15 day report is not necessary as entering category C-3 requires prompt notification per 10CFR50.72(b)2(i) prior to plant operation and a report per 10CFR50.73(a)2(ii) describing investigations of cause and corrective measures.

Similarly, results of the inspections of F* and L* tubes should be deferred to the 12 month report. The current requirement is to provide a report to the Director, ONRR, prior to the restart of the unit; however, NRC approval of this report is not required prior to restart.

- 5) SCE&G also endorses the comments submitted by the Nuclear Management and Resources Council (NUMARC), particularly the comment that, "The staff is in the best position to properly identify information required to fulfill its obligation to protect the health and safety of the public, and propose changes to delete or modify requirements where appropriate."

Mr. David L. Meyer
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If there are any questions on these comments, please contact Mr. John Cobb at
(803) 345-4213.

Very truly yours,

Gary S. Taylor for
JL Skolds

John L. Skolds

JMC:lcd

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