



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4040

John L. Skolds
Vice President
Nuclear Operations

DECEMBER 7, 1992

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
CLARIFICATION OF RESPONSE TO GENERIC LETTER 90-06 (LTR 900006-1)

South Carolina Electric & Gas Company (SCE&G), is submitting this letter to clarify a response to Generic Letter (GL) 90-06 contained in a submittal dated December 21, 1990. The NRC has raised a question with respect to SCE&G's response to Position 3.1.2 of Enclosure A to the Generic Letter.

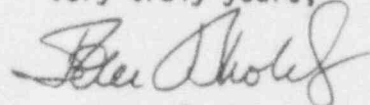
The question centers around the explanation of why the PORVs and the PORV control air system valves are not included in the IST program. SCE&G's response describes why these valves do not meet the definition of an active valve and, therefore, are not required by the ASME code to be tested per Section XI. However, the response does not clearly explain that the tests which are performed on these valves (outside of the IST program) meet the Section XI requirements. The test procedures are denoted and tracked as an NRC commitment and, therefore, are controlled to maintain the commitment. The intent of the response was to explain that Position 3.1.2 is met by the test program and that SCE&G does not intend to test the valves under the IST program.

In conclusion, SCE&G's response was intended to state that the PORVs and valves in its associated control air system are being adequately tested, and the tests are being adequately controlled to meet the requirements of the Generic Letter without the inconsistency presented by placing the valves in the IST program.

I declare that the statements and matters set forth herein are true and correct to the best of my knowledge, information, and belief.

Should you have further questions on this subject, please contact David Haile at (803) 345-4322.

Very truly yours,


John L. Skolds

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c:	O. W. Dixon	NRC Resident Inspector
	R. R. Mahan	J. B. Knotts Jr.
	R. J. White	NSRC
	S. D. Ebnetter	RTS (LTR 900006-1)
	General Managers	File (815.14)