

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

July 23, 1985

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

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
ASME Section XI
Hydrostatic Testing of
Feedwater System

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) hereby requests relief from the ASME Code/Section XI hydrostatic testing requirements for the Virgil C. Summer Nuclear Station Unit No. 1 Feedwater System. Details of this relief request are contained in the attachment to this letter.

In a letter dated April 3, 1985, SCE&G requested hydrostatic testing relief for the Feedwater System in order to rotate the bodies of the three Feedwater Reverse Flush Valves at the plant. To support the Steam Generator Manifold Inspection [Operating License Condition 2.C(14)], a modification must be made to allow permanent access to the manifold. Preliminary design and procurement activities are now complete and this modification will be accomplished during the scheduled October 1985 refueling outage. A relief from hydrostatic testing of the feedwater system is hereby being requested for this modification. The relief requested in this letter is synonymous with that in the April 3, 1985 letter and involves the elimination of a single hydrostatic test to the entire Feedwater System. Implementation of this modification will alleviate the need for future relief requests supporting the performance of the required inspections.

Please find enclosed the application fee of one hundred fifty dollars (\$150.00) required by Title 10 of the Code of Federal Regulation, Part 170.

Should you have any questions, please advise.

8507260589 850723
PDR ADOCK 05000395
P PDR

Yours very truly,



O. W. Dixon, Jr.

ARK:OWD/lcd
Attachment

cc: (see page #2)

Rec'd w/ checks
for \$150.00

A047
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cc:	V. C. Summer	C. A. Price
	T. C. Nichols, Jr./O. W. Dixon, Jr.	C. L. Ligon (NSRC)
	E. H. Crews, Jr.	K. E. Nodland
	E. C. Roberts	R. A. Stough
	W. A. Williams, Jr.	G. O. Percival
	D. A. Nauman	C. W. Hehl
	J. Nelson Grace	J. B. Knotts, Jr.
	Group Managers	NPCF
	O. S. Bradham	File

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SYSTEM PRESSURE TESTING RELIEF REQUEST

SYSTEM

(FW) Feedwater System

CODE CLASS

2

SYSTEM DRAWING NUMBER

D-302-083

SYSTEM FUNCTION

The Feedwater System provides a flow path for water to the Steam Generators (S/G) where such water absorbs and removes heat from the Reactor Coolant System.

SYSTEM MODIFICATION

In order to provide permanent access for the required visual inspection of the Steam Generator preheater baffles, SCE&G intends to install blank flanges on three (3) existing 2" half couplings (one per steam generator) located on the main feedwater piping. Design and installation will be in accordance with the ASME Code, Section XI, 1977 Edition through and including summer 1978 Addenda.

SYSTEM TEST REQUIREMENT

Subsequent to repairs or modifications by welding which penetrate the pressure boundary on piping greater than one inch diameter, conduct a hydrostatic test on piping where such repairs or modifications were performed.

Pursuant to ASME Code, Section XI, 1977 Edition through and including summer 1978 Addenda, hydrostatic test pressure is 1.25 Psv or 1470 PSI where Psv is the lowest pressure setting among the main steam safety valves.

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BASIS FOR RELIEF

Performing the required hydrostatic test on the Feedwater piping subsequent to the modification would be extremely difficult, impractical, and expensive due to the following:

1. The inability to maintain pressure due to potential leakage through the Feedwater Isolation Valves, Main Steam Isolation Valves, and other valves connected to the system.
2. Additional time and effort to pin or block main steam constant support and variable spring hangers.
3. Additional time and effort to remove the Main Steam Safety Valves and blank the inlet piping.
4. Potential for placing excess stress on the Steam Generator shells.
5. Potential for damage to system instrumentation, or considerable time delay due to additional time and effort expended to isolate or remove instrumentation.
6. Potential for damage to Steam Generator tube bundles.
7. Isolation and preparation of this system would result in additional radiation exposure to personnel.

In addition to the above seven (7) reasons, the alternate examinations specified will provide a level of confidence and quality equal to or better than the required testing per the ASME Code.

ALTERNATE EXAMINATIONS FOR MAIN FEEDWATER PIPING WELDS

Prior to declaring the Feedwater System operable, the following examinations will be performed to the affected Feedwater System piping welds--except for Item 4, which will be completed at the end of the First Inservice Inspection Interval:

1. MT Examination on the root pass and final weld surface pursuant to ASME Code Section V, Article 7.

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2. Visual Examination.
3. Perform Inservice Leak Test at nominal operating pressure.
4. Perform Hydrostatic Test at the end of the 10 Year Interval.

IMPLEMENTATION

The alternate examinations will be performed in accordance with approved written procedures by qualified personnel after the Feedwater Modification and before the system is declared operable.