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Gary J. Taylor
Vice President
Nuclear Operations

October 30, 1996
RC-96-0261

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
RESPONSE FOR PROPOSED ACTIONS
REGARDING GENERIC LETTER 96-06

Pursuant to 10CFR50.54(f), the Nuclear Regulatory Commission (NRC) issued Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions", requesting that licensees determine (1) if containment air cooling water systems are susceptible to either water hammer or two-phase flow conditions during postulated accident conditions, and (2) if piping systems that penetrate the containment are susceptible to thermal expansion of fluid so that overpressurization of piping could occur. The generic letter requires that each plant respond within 30 days (October 30, 1996) indicating: (1) whether or not the requested actions will be completed, (2) whether or not the requested information will be submitted and (3) whether or not the requested information will be submitted within the requested 120 day time period.

South Carolina Electric and Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby submits the current review status and the planned action, as it applies to the Virgil C. Summer Nuclear Station (VCSNS), in response to Generic Letter 96-06. This submittal addresses the action required for the 30 day response.

The first issue involves the Reactor Building Cooling Units (RBCUs) at VCSNS and their associated piping inside containment. This piping forms a closed system inside containment. Pressure surges due to column voiding (flashing) and rejoining (collapsing) have been known to occur in the system. These pressure surges were measured and analyzed and did not exceed the system design pressure. Although, SCE&G feels that there is no concern for system function/operability, it was decided to analyze the problem further. Currently SCE&G is in the process of modeling the RBCUs and their associated systems and piping for the conditions described in the Generic Letter. SCE&G expects to have the initial analysis involving the model completed by the end of 120 days (January 28, 1997).

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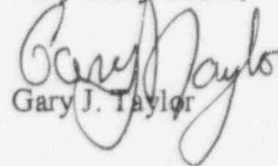
The second issue involves the potential over-pressurization of piping penetrating the Reactor Building (RB) containment. The scoping review for this issue identified approximately 115 piping penetrations. In general, the penetrations have relief devices such as check valves or relief valves to prevent over-pressurization. SCE&G is currently performing a review of all of the piping penetrations to determine their susceptibility to this issue. At the end of 120 days, SCE&G expects to have completed this review.

In summary, SCE&G is addressing both issues presented in GL 96-06 and is intent on aggressively moving forward to close these issues out. SCE&G expects to have all preliminary reviews/analyses completed within the 120 days as requested. At which time we will submit a report stating actions taken, conclusions reached, the basis for continued operability, and corrective actions planned/implemented in regards to these issues. As potential issues/problem areas are identified, SCE&G will determine a course of action for each. Once determined, each course of action will be carried to its logical conclusion performing any modifications that may be required.

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

Should you have any questions, please call Mr. Jim Turkett at (803) 345-4047 at your convenience.

Very Truly Yours,



Gary J. Taylor

JWT/GJT/nkk

c: J. L. Skolds
W. F. Conway
R. R. Mahan
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NRC Resident Inspector

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NSRC
DMS (RC-96-0261)
RTS (LTR 960006)
File (815.14)

STATE OF SOUTH CAROLINA :

: TO WIT :

COUNTY OF FAIRFIELD :

I hereby certify that on the 30th day of October 19 96, before me, the subscriber, a Notary Public of the State of South Carolina, personally appeared Gary J. Taylor, the Vice President, Nuclear Operations of the South Carolina Electric and Gas Company, a corporation of the State of South Carolina, that he provides the foregoing response for the purposes therein set forth, that the statements made are true and correct to the best of his knowledge, information, and belief, and that he was authorized to provide the response on behalf of said corporation.

WITNESS my Hand and Notarial Seal

Michael J. Fawcett
Notary Public

My Commission Expires

My Commission Expires July 13, 2005