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DS09
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Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Mail Stop T-6D-69
Washington, DC 20555-0001

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RULES REVIEW BRANCH
USNRC

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
PROPOSED GENERIC COMMUNICATION: "EFFECTIVENESS OF
ULTRASONIC TESTING SYSTEMS IN INSERVICE INSPECTION
PROGRAMS."

South Carolina Electric & Gas Company (SCE&G) requests that the following general comments to the subject Proposed Generic Letter (GL) be addressed by the Nuclear Regulatory Commission (NRC):

1. The proposed Generic Letter seems to approach mandating the implementation of Appendix VIII (App.VIII) requirements. These requirements will cause a significant increase in the required control of personnel, equipment, and procedures necessary to perform refueling inspections. This would have an adverse economic impact and result in increased outage duration. This would be an undue hardship without a compensating increase in quality.
2. It is not clear that the concerns raised by the GL are an issue at PWRs.

South Carolina Electric & Gas (SCE&G) submits the following specific comments with regard to the proposed GL:

1. The first concern is that App. VIII proposes a standard in ultrasonic testing (UT) which raises the qualification requirements of UT inspectors to a level that will potentially reduce the number of qualified UT inspectors to less than the number required by the licensees. This could result in the unavailability of qualified personnel to support outage initiatives, adversely impacting outage duration, without a compensating increase in quality.

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NUCLEAR EXCELLENCE - A SUMMER TRADITION!



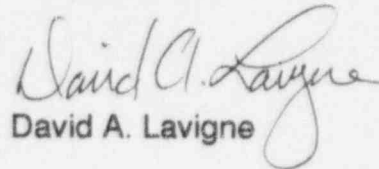
DS-5 Generic
Letter

2. The second concern is that, based on the "Description of Circumstances" and the "Regulatory Requirements" sections of the GL, it appears that the evidence only brings to question the adequacy of inspections at BWRs where IGSCC is a major problem. The proposed GL attempts to apply a one-size-fits-all philosophy, by advocating that an App. VIII type inspection be incorporated by plants where there is little or no evidence that the current UT standards are not adequate. This conclusion seems to be supported by the GL itself. Under "Description of Circumstances" the NRC states that "it should be noted that a safety concern does not exist which would warrant immediate backfitting of Appendix VIII in advance of the rulemaking that has been initiated." Based on this statement, SCE&G suggests that the GL be withdrawn.
3. If the NRC deems it necessary to issue a generic letter to emphasize the use Appendix VIII standards, it should be in relation to the need at the various type plants. For example, BWRs that experience IGSCC problems should fully implement App. VIII, where as a PWR that has no unusual degradation mechanisms could conduct inspections using current standards and App. VIII inspections at Ten-Year-Intervals. If the App. VIII inspection found significant deficiencies in the current standards utilized at that facility, the App. VIII inspection frequency could be adjusted accordingly.
4. The proposed GL is not clear as to what the NRC is trying to accomplish via the requested responses. The discussion in the letter combined with the questions asked suggests that a utility which is not pursuing implementation of App. VIII type inspections is subject to possible enforcement under the 10CFR50 Appendix A and B Criterion mentioned in the proposed GL. This is confusing due to the fact that the NRC could have included App. VIII as part of their rule change when they endorsed the 1989 Edition of the ASME Code in 10CFR50.55a. This is the regulation which mandates the ASME edition to be used in the utilities 10-Year-Interval inspection program. Also, if the safety significance supported it, the NRC could change 10CFR50.55a without waiting for the rulemaking to allow the use of the 1995 Code.

5. It appears that the NRC is rightly hesitant to mandate App. VIII, and even though some utilities are willing to, and actually have raised their UT standards, the utilities are not likely to make long term commitments to adopt App. VIII standards and the associated cost, without sufficient justification from an increased safety point of view. Therefore, it would be helpful to the utilities if the NRC would refine their description of what level of UT standards is necessary to satisfy the NRC regulations.

Should you have any questions, please call Mr. Jeffrey Pease at (803) 345-4124.

Very truly yours,


David A. Lavigne

JWP/DAL/nkk

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