

February 19, 2007
RC-07-0028



U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
INSPECTION AND MITIGATION OF ALLOY 82/182 PRESSURIZER
BUTT WELDS (C-04-1719) - SUPPLEMENT

Reference: 1. Marvin S. Fertel (NEI) Letter to Luis A. Reyes (NRC), Industry Actions
Associated with Potential Generic Implications of Wolf Creek Inspection
Findings, January 26, 2007
2. Jeffrey B. Archie Letter to Document Control Desk, Inspection and Mitigation
of Alloy 82/182 Pressurizer Butt Welds (C-04-1719), dated January 31,
2007, RC-07-0021

Pursuant to your February 12, 2007 telephone conference call with our Virgil C. Summer Nuclear Station (VCSNS) staff, South Carolina Electric and Gas Co. (SCE&G) submits a supplemental response to reference 2.

In response to your concerns regarding reactor coolant system (RCS) leakage monitoring, VCSNS is performing the following RCS leakage measurements:

- Daily measurement of unidentified leakage.
- Identification of unidentified leakage rates greater than either of the following limits when this increase is maintained for 3 days:
 - 0.25 gpm greater than a baseline value.
The baseline is established as the value obtained following 7 days of full power operation after startup following the last bare metal visual examination of the pressurizer Alloy 82/182 butt weld locations.
 - 0.1 gpm increase between two consecutive daily measurements.
- If unidentified leakage exceeds either limit, identify the source within 72 hours or shut down the plant and perform bare metal visual examinations of all pressurizer Alloy 82/182 butt weld locations. Following the initiation of a shutdown, the plant must be in Hot Standby in 6 hours and in Cold Shutdown in 36 hours.

- A positive determination that the source of the unidentified leakage did not come from the pressurizer will negate the requirement for shutdown and/or pressurizer Alloy 82/182 butt weld bare metal examination.
- If a quantity of leakage can be assigned to a source other than the pressurizer and that quantity decreases the unidentified leakage below one of the thresholds (0.1 gpm step increase or 0.25 gpm above baseline), this will negate the requirement for shutdown and/or pressurizer Alloy 82/182 butt weld bare metal examination.
- Report results of any bare metal visual inspections to NRC 60 days after plant start up.

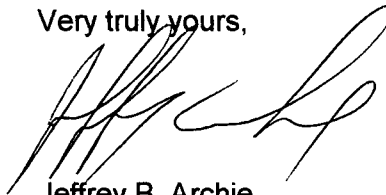
In response to your concerns regarding schedule acceleration, VCSNS will accelerate its inspection or mitigation outage, currently scheduled for April 2008, into 2007 if the results of ongoing industry analysis do not demonstrate to the NRC that current schedules are adequate. In addition, the schedule could be accelerated into 2007 if new information is obtained during upcoming inspections that challenge current assumptions.

Commitments made through this letter are identified in the attachment to this letter and will be in place until the pressurizer Alloy 82/182 butt welds have been successfully inspected and/or mitigated.

SCE&G staff is available to meet with the NRC to discuss any of the information contained in this letter.

Should you have questions, please call Mr. Bruce Thompson at (803) 931-5042.

Very truly yours,



Jeffrey B. Archie

AJC/JBA/dr

Attachment: List of Commitments

c: K. B. Marsh
S. A. Byrne
N. S. Carns
J. H. Hamilton
R. J. White
W. D. Travers
R. E. Martin

NRC Resident Inspector
K. M. Sutton
J. Riley (NEI)
NSRC
RTS (C-04-1719)
File (815.02)
DMS (RC-07-0028)

**List of Commitments
Alloy 82/182 Program Enhancements**

No.	COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
			ONE-TIME ACTION (Yes/No)	PROGRAMMATIC ACTION (Yes/No)
1.	Daily measurement of unidentified leakage.	Until inspection and/or mitigation of pressurizer Alloy 82/182 butt welds	Yes	No
2.	<p>Identification of unidentified leakage rates greater than either of the following limits when this increase is maintained for 3 days:</p> <ul style="list-style-type: none"> ▪ 0.25 gpm greater than a baseline value. <p>The baseline is established as the value obtained following 7 days of full power operation after startup following the last bare metal visual examination of the pressurizer Alloy 82/182 butt weld locations.</p> <ul style="list-style-type: none"> ▪ 0.1 gpm increase between two consecutive daily measurements. 	Until inspection and/or mitigation of pressurizer Alloy 82/182 butt welds	Yes	No
3.	If unidentified leakage exceeds either limit, identify the source within 72 hours or shut down the plant and perform bare metal visual examinations of all pressurizer Alloy 82/182 butt weld locations. Following the initiation of a shutdown, the plant must be in Hot Standby in 6 hours and in Cold Shutdown in 36 hours.	Until inspection and/or mitigation of pressurizer Alloy 82/182 butt welds	Yes	No
4.	Results of any bare metal visual inspections will be reported to the NRC 60 days after plant start up.	Until inspection and/or mitigation of pressurizer Alloy 82/182 butt welds	Yes	No

No.	COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
			ONE-TIME ACTION (Yes/No)	PROGRAMMATIC ACTION (Yes/No)
5.	VCSNS will accelerate its inspection or mitigation outage, currently scheduled for April 2008, into 2007 if the results of ongoing industry analysis do not demonstrate to the NRC that current schedules are adequate. In addition, the schedule could be accelerated into 2007 if new information is obtained during upcoming inspections that challenge current assumptions.	Until inspection and/or mitigation of pressurizer Alloy 82/182 butt welds	Yes	No