



May 31, 2000
RC-00-0247

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

Gentlemen:

Stephen A. Byrne
Vice President
Nuclear Operations
803.345.4622

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395 OPERATING LICENSE NO.
NPF-12 SUPPLEMENTAL RESPONSE TO
GENERIC LETTER 97-06 "DEGRADATION OF
STEAM GENERATOR INTERNALS"

Reference: Letter RC-98-0051 from Mr. Gary J. Taylor to the
NRC Document Control Desk, dated March 19,
1998, Response to Generic Letter 97-06:
Degradation of Steam Generator Internals

Reference: Letter RC-99-0023 from Mr. Gary J. Taylor to the
NRC Document Control Desk, dated February 1,
1999, Response to Generic Letter 97-06:
Degradation of Steam Generator Internals

In the referenced letters, South Carolina Electric & Gas Company (SCE&G) provided our responses to Generic Letter 97-06, "Degradation of Steam Generator Internals." In the responses, we informed the Commission of actions performed during refueling outage, RF-9 (spring 1996). The letters stated that a visual inspection was performed on the secondary side of the steam generators. The reference letters also stated two additional activities were completed:

1. an examination of the upper tube bundle using remote visual techniques at several tube bundle elevations, including the top of the tube sheet, and
2. that sludge was removed from a sludge collector tray.

South Carolina Electric & Gas Co
Virgil C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, South Carolina
29065

803.345.4344
803.345.5209
www.scana.com

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During the week of April 10, 2000, an assessment of Steam Generator maintenance programs found that documentation supporting completion of the work listed in the response to the Generic Letter was not available. Significant structural modifications were made to the primary moisture separator section of the steam generators during RF-9. The in-process and closeout inspections following the work were the basis for information provided in the Generic Letter response. After additional documentation searches and interviews with personnel directly involved with the activities, including past employees, the station concluded that sufficient documentation was not available to support some of the statements in the letter.

The purpose of this letter is to clarify the status of the 3 activities listed in paragraph 1.

1. The intent of the visual inspection (secondary side of the steam generators) was for the purpose of verifying cleanliness and structural integrity subsequent to the structural modification being completed.
2. An examination of the upper tube bundle was not completed during Refueling Outage 11. This work is scheduled in Refueling Outage 12 (fall 2000).
3. Sludge was not removed from the sludge collection tray as stated. A visual inspection was performed and a decision was made not to remove the sludge due to the small amount of sludge deposited. Sludge removal is scheduled for Refueling Outage 12 (fall 2000).

SCE&G has reviewed all documentation associated with the Generic Letter 97-06 responses and no other discrepancies have been identified. Other documents are being reviewed to verify that all commitments relative to steam generators have been identified.

SCE&G regrets the miscommunication.

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

Very truly yours,



Stephen A. Byrne

SAB/jwp

c: J. L. Skolds
T. G. Eppink
R. J. White
L. A. Reyes
K. R. Cotton
NRC Resident Inspector
J. B. Knotts, Jr.

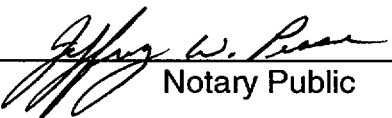
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NSRC
RTS (GL 97-06)
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(O-C-00-0553)
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DMS (RC-00-0247)

STATE OF SOUTH CAROLINA :
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COUNTY OF FAIRFIELD :
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TO WIT :

I hereby certify that on the 31st day of MAY 2000, before me, the subscriber, a Notary Public of the State of South Carolina personally appeared Stephen A. Byrne, being duly sworn, and states that he is Vice President, Nuclear Operations of the South Carolina Electric & 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



Notary Public

My Commission Expires

July 26, 2005
Date

