



July 17, 2000
RC-00-0271

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

Attention: Ms. K. R. Cotton

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
WITHDRAWAL OF REQUEST FOR RELIEF (NRR 990001)
STEAM GENERATOR - PORV STROKE TIME

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- Reference:
1. Gary J. Taylor (SCE&G) letter RC-99-0147 to Document Control Desk (NRC), dated July 26, 1999
 2. J. Turkett (SCE&G) electronic mail to Karen R. Cotton (NRC), January 31, 2000
 3. Karen R. Cotton (NRC) electronic mail to J. Turkett (SCE&G), April 15, 2000.

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In Reference 1 above, South Carolina Electric & Gas Company (SCE&G), submitted a request for relief from performing steam generator power operated relief valve (SG-PORV) stroke time testing to the acceptance criteria of the joint American Society of Mechanical Engineers (ASME) and American National Standards Institute (ANSI) Operations and Maintenance Code, ASME/ANSI Oma-1988. This request was to apply a maximum stroke time without applying the Code specified tolerances due to inherent stroke time variances of the SG-PORV operators, that required implementing the corrective actions of 4.2.1.9 of Part 10.

In a telephone conference between the V. C. Summer Nuclear Station (VCSNS) NRR Project Manager, the NRC technical reviewer, and SCE&G on January 27, 2000, the technical reviewer discussed several issues that were addressed by the VCSNS System Engineer. The reviewer requested copies of program documentation and valve vendor information. This information was provided by transmittal to the Project Manager through Reference 2. Subsequently, SCE&G was advised through Reference 3 to resubmit the relief request incorporating specific VCSNS preventive maintenance actions into the alternative testing and safety evaluation.

The incorporation of the preventive maintenance practices into the alternative testing would create an additional surveillance burden which SCE&G has determined would offset the benefits sought by the current relief request submittal. Additionally, this would establish a precedent by entailing plant maintenance into required surveillance activities. SCE&G's position is that the inclusion of preventive maintenance activities into the relief request, as specified, are not relevant to the basis of the original request.

Therefore, SCE&G has reviewed the current SG-PORV stroke time testing program with respect to the Code requirements and determined that application of baseline stroke time adjustments were conducted in an overly conservative manner. Procedures and practices for establishing new reference values have been revised. Retest methods have also been strengthened to improve repeatability. Future SG-PORV testing is not expected to conflict with the acceptance criteria at the frequency previously experienced.

Accordingly, SCE&G desires to withdraw the request made in the application (Reference 1) of July 26, 1999. Should the actions taken not prove successful or, if similar conditions arise on future testing, SCE&G will resubmit the relief request, including the prescribed directives, at that time.

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

Very truly yours,



Stephen A. Byrne

JT/SAB/dr

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