



DOCKET NUMBER
PETITION RULE PRM 50-71
(65FR34599)

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RC-00-0304
September 9, 2000

Rules and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON DOCKET No. PRM-50-71, NUCLEAR ENERGY
INSTITUTE; RECEIPT OF PETITION FOR RULEMAKING

South Carolina Electric and Gas Company (SCE&G) submits the following
comments on DOCKET No. PRM-50-71, NUCLEAR ENERGY INSTITUTE;
RECEIPT OF PETITION FOR RULEMAKING.

SCE&G agrees that the industry needs relief on the use of zirconium-based
cladding. However, since the fuel cladding is a critical safety barrier (i.e., fission
product barrier), the basis for that relief should come from proven, in-reactor
performance. SCE&G believes that a better approach would be to update the
approved list of allowed fuel rod cladding materials as more products develop
proven, in-reactor performance.

SCE&G appreciates the opportunity to comment on this proposed rule;
however, we do not endorse the proposal as written. Should you have any
questions, please call Mr. Arnie Cribb of my staff at (803) 345-4346.

Very truly yours,

Stephen A. Byrne

AJC/SAB

- c: N. O. Lorick
- T. G. Eppink
- R. J. White
- L. A. Reyes
- K. R. Cotton

J. B. Knotts, Jr.
NRC Resident Inspector
NSRC
DMS (RC-00-0304)
RTS (O-L-00-0106)
File (811.02)

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

Template = SECY-067

SECY-02

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