



January 8, 2001
RC-01-0008

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

Attention: Ms. K. R. Cotton

Stephen A. Byrne
Vice President
Nuclear Operations
803.345.4622

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
WITHDRAWAL OF REQUEST FOR RELIEF
TO USE ULTRASONIC EXAMINATION IN LIEU OF
RADIOGRAPHIC EXAMINATION OF CLASS 1 PIPING REPAIR
(NRR 00-0252)

Reference: 1. Stephen A. Byrne (SCE&G) letter RC-00-0344 to Document
Control Desk (NRC), dated November 13, 2000
2. Stephen A. Byrne (SCE&G) letter RC-00-0361 to Document
Control Desk (NRC), dated November 22, 2000

In Reference 1 above, South Carolina Electric & Gas Company (SCE&G), submitted a request for relief from performing radiographic examination (RT) as the acceptance inspection for the A loop hot leg weld repair. This inspection is required to be performed by the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code, Section III. The justification provided in the referenced letter stated that the radiographic inspection is impractical due to significant dose rates in the area and on contact with the pipe (ALARA). The major technical concern was the quality of inspection that could be obtained using RT examinations. Additionally, there was considerable doubt as to whether positioning the source on the inside of the pipe was feasible due to limited access, high dose rates and uncertain delivery and centering capability. This would have required a double wall shot, which would increase the time for each shot (multiple shots per weld) and dose collected during the performance of the examination.

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A047

South Carolina Electric & Gas Co.
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Since the submittal of both referenced letters, additional information has become available that indicates an acceptable radiographic examination can be performed. This examination will be performed with the source on the inside of the pipe with the film on the outside. The positioning of the source will be by robot via the A Steam Generator hot leg manway. This capability will allow for one shot per weld and will significantly minimize the dose collected.

Radiographic inspection is the common method of insuring Code compliance for welds in Class 1 and Class 2 piping. All Code Section III requirements will be satisfied prior to final acceptance of the weld. Additional inspections will be performed on the welds to satisfy other Code requirements.

As such, this relief request is being withdrawn. Should you have questions, please call Mr. Philip A. Rose at (803) 345-4052.

Very truly yours,



Stephen A. Byrne

PAR/SAB/dr

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NSRC
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