



April 5, 2001
RC-01-0051

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
REACTOR VESSEL RADIATION SURVEILLANCE PROGRAM

- Reference:
1. Gary J. Taylor Letter to Document Control Desk, October 9, 1998, RC-98-0185
 2. WCAP-15101, Revision 0, Analysis of Capsule W from the South Carolina Electric & Gas Company V. C. Summer Unit 1 Reactor Vessel Radiation Surveillance Program

The schedule requirements listed in the ASTM Standard (ASTM E185-73, 79, 82) are based on expected or predicted neutron fluence levels at specific distances on or into the reactor vessel wall. Our initial schedule was approved by the NRC at the time of initial licensing; the revised schedule was approved via license Amendment 53 and was noticed with the opportunity for public hearing. The NRC issued Administrative Letter (AL) 97-04 to inform licensees that changes to their facilities' reactor vessel surveillance specimen capsule withdrawal schedules as specified in 10 CFR 50 Appendix H that do not conform to the required ASTM Standard will be treated as license amendments requiring public notice and an opportunity for a hearing.

VCSNS technical specifications state that we conduct testing and surveillance of material specimens according to 10 CFR 50 Appendix H. Appendix H, in turn, requires schedules to meet an applicable ASTM Standard. Per AL 97-04, as long as the withdrawal schedule change meets the applicable ASTM Standard, the plant will not be exceeding the operating authority already granted in its license. Therefore, a license amendment would not be required although prior NRC approval to verify conformance with the ASTM Standard is required by Appendix H.

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The proposed surveillance capsule withdrawal schedule with technical justification was submitted for your review (see reference 1). The proposed revision to the removal schedule (see reference 2, page 7-1) is technically justified since the projected 32 EFPY fluence for the reactor vessel beltline material is less than the estimated fluence exposure of Capsule W.

VCS requests that the proposed schedule be approved by the NRC per 10 CFR 50 Appendix H, III.B.3.

Should you have any questions, please contact Michael J. Zaccone at 803-345-4328.

Very truly yours,



Stephen A. Byrne

MJZ/SAB/dr

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