



August 7, 2001
RC-01-0136

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

Attention: Ms. Karen R. Cotton

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON PRELIMINARY ACCIDENT PRECURSOR ANALYSIS
OF SEPTEMBER 2000 OPERATIONAL CONDITION

Reference: Letter from Karen R. Cotton, NRC, to Stephen A. Byrne, SCE&G, dated
June 12, 2001

South Carolina Electric & Gas Company (SCE&G) has reviewed the preliminary copy of the Accident Sequence Precursor (ASP) Program Analysis provided by your transmittal dated June 12, 2001. The analysis concerned the operational condition that was discovered at the V. C. Summer Nuclear Station (VCSNS) on September 21, 2000. The condition was reported by SCE&G in Licensee Event Report (LER) No. 395/00-006.

The review included the technical adequacy of the preliminary ASP analysis and the depiction of plant equipment and equipment capabilities. The following comments are provided to enhance the accuracy of the analysis:

- Modeling Assumptions, Model update (bottom of page 3), states "The analysis assumes that high temperature seals were installed on all RCPs at the time of the event." Response: High temperature seals were installed on two of three RCPs at the time of the event. The 'B' RCP seal was changed during RF12 that started in October 2000. High temperature seals had been installed in RF10 and RF11 in RCPs 'C' and 'A' respectively prior to the September 2000 event.
- Attachment 1- HRA Calculations, item 1, on page 13, under "Unlock and open the valve (action)". Response: The NRC assumed that operators would have to "locate the key or bolt cutters" to unlock and open the discharge valve. The lock is a plastic lock, similar to those on a service meter, that is made to be broken open by hand. The chain is light-weight and is designed to be broken, if necessary, at the valve without cutters. This feature will save the time of locating keys or bolt cutters.

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V.C. Summer Station appreciates the opportunity to review and provide comments on the preliminary copy of the analysis. It is understood that our response is voluntary and does not constitute a licensing requirement.

If additional information is necessary, please call Jim Turkett at (803) 345-4047.

Very truly yours,



Stephen A. Byrne

BTE/JT/SAB/dr

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