Stephen A. Byrne
Senicr Vice President, Nuclear Operations
802 245 155



722 JM 22 M 9: 17

December 20, 2001 RC-01-0204

11/9/01 66 FR 56721

Chief, Rules and Directives Branch Division of Administrative Services Mailstop T 6 D 59 U. S. Nuclear Regulatory Commission Washington, DC 20555-0001

Gentlemen:

SUBJECT:

VIRGIL C. SUMMER NUCLEAR STATION

DOCKET NO. 50-395

OPERATING LICENSE NO. NPF-12

COMMENTS ON THE DRAFT SUPPLEMENT TO THE FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT ON

DECOMMISSIONING OF NUCLEAR FACILITIES

Reference:

Draft Supplement 1 to NUREG-0586, "Final Generic Environmental

Impact Statement on Decommissioning of Nuclear Facilities"

November 9, 2001, Federal Register, 66-FR-56721

South Carolina Electric & Gas (SCE&G) company offers the following comments on the above-mentioned document.

Page 3-24 mentions the containment ceiling being lowered to the top of the pressurizer for a PWR under the ENTOMB2 option. Appendix E, page 9 lists this action as optional. This action needs to clearly be listed as optional on pages 3-24, 3-25, and 3-31. SCE&G believes this action should be optional as listed in Appendix E due to the extreme effort to lower the ceiling of a massive building such as the reactor building and yet maintain it intact for entombment purposes.

Also, on page 3-24 "low density concrete grout" is mentioned. Grout is not lightweight, but concrete can make use of lightweight large aggregate to lower the weight per volume. Therefore, SCE&G recommends concrete be used in place of grout on pages 3-24, 3-25, 3-31, and 3-33.

Hemplole = ADM

E-RIDS = ADM-03 CIBR = M. M. GSDIK (MTM2)

Nuclear Regulatory Commission 0-L-99-0290 RC-01-0204 Page 2 of 2

If you have any questions, please call Chris Crowley of my staff at (803) 345-4409.

Very truly yours,

Stephen A. Byrne

CAC/SAB/mb

c: N. O. Lorick

N. S. Carns

T. G. Eppink

R. J. White

L. A. Reyes

R. R. Assa

NRC Resident Inspector

K. M. Sutton

W. R. Higgins

RTS (0-L-99-0290 #4)

File (811.10)

DMS (RC-01-0204)