



September 16, 2002
RC-02-0161

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U. S. Nuclear Regulatory Commission
Washington, DC 20555

Ladies and Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
REQUEST FOR REVISION TO ASME BOILER AND PRESSURE
VESSEL CODE, SECTION XI RELIEF REQUEST (NRR 00-0058)
RR-II-07

- Reference:
1. EPRI TR-112657, "Revised Risk-Informed Inservice Inspection Evaluation Procedure"
 2. USNRC letter to Electric Power Research Institute (EPRI), dated October 28, 1999, regarding "Safety Evaluation Procedure (EPRI TR-112657, Revision B, July 1999)

South Carolina Electric and Gas Company (SCE&G) requests relief to use the proposed Risk-Informed Inservice Inspection Program (RI-ISI) [Attachment I] as an alternative to the current ASME Section XI inspection requirements for Class 1, Examination Category B-F and B-J, and Class 2, Examination Category C-F-1 and C-F-2 welds pursuant to 10 CFR 50.55a(a)(3)(i). The RI-ISI Program has been developed in accordance with the EPRI methodology contained in EPRI TR-112657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure" (Reference 1). EPRI TR-112657 was approved by the NRC Safety Evaluation Report, dated October 28, 1999 (Reference 2). The attached VCSNS specific RI-ISI evaluation (Attachment II) supports the conclusion that the proposed alternative provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i).

SCE&G plans to implement the initial VCSNS RI-ISI program during the inspection period in effect at the time of the program approval. The VCSNS Inservice Examination program will continue to evaluate industry events and experiences relative to the station Risk-Informed Inspection program. Relief request approval is requested by February 7, 2003, in support of Refueling Outage 14 (RF14) currently scheduled for the Spring of 2003.

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Document Control Desk
NRR 00-058
RC-02-0161
Page 2 of 2

The relief request is included as an attachment to this letter.

Should you have any questions concerning the application or approval of this relief request, please contact Mr. Mel Browne at (803) 345-4141.

Very truly yours,



Stephen A. Byrne

JT/SAB/dr

Attachment(s): Attachment I, except where
noted. Attachment II available upon
request.

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Document Control Desk
Attachment I
NRR 00-0058
RC-02-0161
Page 1 of 2

**South Carolina Electric & Gas Co. (SCE&G)
Virgil C. Summer Nuclear Station (VCSNS)
Relief Request
RR-II-07**

Subject:

Implementation of Risk-Informed Inservice Inspection program.

Components Identification:

All pressure retaining components under the ASME Categories B-F, B-J, C-F-1 and C-F-2.

Current Code Requirement:

ASME Code, Section XI, Table IWX-2500-1 for Examination Categories B-F, B-J, C-F-1 and C-F-2 require specific percentages of the weld population to be inspected each inspection Interval.

RELIEF REQUEST:

Relief is requested from the IWB-Table-2500-1 and IWC-Table-2500-1 percentages of piping weld populations scheduled for examination.

Alternative Test:

Apply the Risk-Informed Inservice Inspection weld selection criteria as detailed in the EPRI TR-112657 V. C. Summer Nuclear Station (VCSNS) specific evaluation which is consistent with ASME Code Case N-578 during the second Interval inspection program.

Basis for Relief:

VCSNS is presently required to schedule piping weld inspections in accordance with the 1989 Edition of ASME Section XI. The current selection of welds for inspection is based on the inherent design stress intensity and usage factor. The alternative EPRI Topical Report-Number 112657 and Code Case N-578 require extensive engineering evaluation of all piping segments subject to the ASME Section XI Inservice Examination Program. This engineering evaluation bases the selection and scheduling of piping welds on probable failure potential.

Document Control Desk
Attachment I
NRR 00-0058
RC-02-0161
Page 2 of 2

In accordance with the guidelines of the Code Case and the Technical Report, the piping systems subject to the Inservice Examination Program at VCSNS have been evaluated, categorized for failure potential and ranked relative to risk of failure. The "Risk-Informed Inservice Inspection Program Plan, V. C. Summer Nuclear Station, Revision 0" document (Attachment II) details the engineering evaluation and the specific piping segments selected for inspection selection. Therefore, the proposed alternative weld selection process will provide an acceptable level of quality without an increased level of risk.

Document Control Desk
Attachment II
NRR 00-0058
RC-02-0161
Page 1 of 1

Risk-Informed

Inservice Inspection Plan

V. C. Summer Nuclear Station

Revision 0