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Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON DRAFT REGULATORY GUIDE DG-1123,
VERIFICATION, VALIDATION, REVIEWS, AND AUDITS FOR
DIGITAL COMPUTER SOFTWARE USED IN SAFETY SYSTEMS
OF NUCLEAR POWER PLANTS

South Carolina Electric and Gas Company (SCE&G) submits the following comments on DG-1123.

In regards to the Regulatory Position, Section 3 on "Independence of Software V & V", specifically the last sentence of this section on page 6: "The NRC Staff position is that this does not require that a separate company perform independent V & V: a separate organization within a company will satisfy this clause provided that adequate independence requirements are met."

This position appears to endorse a level of control in excess of that imposed by Appendix B on safety-related items. Appendix B, Criterion III, states "The verification or checking process shall be performed by individuals or groups other than those who performed the original design, but who may be from the same organization."

SCE&G's program, which meets the current requirements of 10 CFR 50, Appendix B, has always allowed the Independent verification of design to be performed by another individual within the same organization. Application of our program to software design will continue to allow the design verification to be performed by the functional organization that has the knowledge level required for a proper software design review.

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SCE&G appreciates the opportunity to comment on this draft regulatory guide. Should you have any questions, please call Mr. Jeffrey Pease at (803) 345-4124.

Very truly yours,



Stephen A. Byrne

AJC/SAB

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