



October 23, 2003  
RC-03-0221

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

Dear Sir/Madam:

**Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING REQUEST TO USE ALTERNATIVES TO ASME BOILER  
AND PRESSURE VESSEL CODE, SECTION XI, RELIEF REQUEST  
RR-II-11, RR-II-12 (0-C-02-3202)**

- Reference:
1. SCE&G Letter to NRC (Document Control Desk), RC-03-0197, dated September 16, 2003, Resubmittal of Request To Use Alternatives To ASME Boiler and Pressure Vessel Code, Section XI, (C-03-0262), RR-II-9, RR-II-10, RR-II-11, and, RR-II-12
  2. SCE&G Letter to NRC (Document Control Desk), RC-02-0191, dated October 30, 2002, Request To Use Alternatives To ASME Boiler and Pressure Vessel Code, Section XI, RR-II-8, RR-II-9, RR-II-10, RR-II-11, RR-II-12
  3. NRC (K. R. Cotton) Letter to VCSNS October 2, 2003, Request for Additional Information ISI Relief Request RR-II-11, and 12 (TAC NO. MB6647)

South Carolina Electric & Gas Company (SCE&G) hereby submits the attached response to the referenced request for additional information (RAI) regarding relief requests RR-II-11 and RR-II-12 resubmitted by Reference 1 on September 16, 2003.

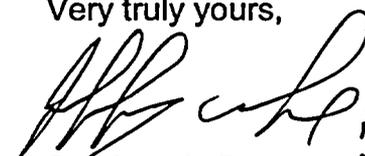
Based on Question 5.1 for relief request RR-II-11 and the accompanying response, SCE&G requests withdrawal of RR-II-11. Code Case N-598 was not yet accepted when Relief was applied for. As Code Case N-598 has been endorsed by Regulatory Guide 1.147, Revision 13, RR-II-11 is no longer needed by VCSNS. Also, two of the proposed areas for relief in RR-II-12 may be withdrawn, however, requested item (c) and the accompanying proposed alternative test (c) are requested for approval. Item (c) utilizes ASME Code Case N 307-3 (Revision 3) which is not yet endorsed by the NRC in Regulatory Guide 1.147 (Revision 13).

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Should you have any questions, please call Mr. Ron Clary at (803) 345-4757.

Very truly yours,

  
Stephen A. Byrne PER DIRECTION  
OF SAB ON 10/23/03

JT/SAB/dr  
Attachments (2)

c: N. O. Lorick  
N. S. Carns  
T. G. Eppink (w/o Attachments)  
R. J. White  
L. A. Reyes  
K. R. Cotton  
K. M. Sutton  
General Managers  
NRC Resident Inspector  
T. A. Mcalister  
A. R. Caban  
NSRC  
RTS (0-C-02-3202)  
File (810.19-2)  
DMS (RC-03-0221)

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**South Carolina Electric & Gas Company (SCE&G)  
Virgil C. Summer Nuclear Station (VCSNS)  
Response to NRC Request for Additional Information (RAI)  
Regarding Inservice Inspection Relief Request  
RR-II-11**

TAC MB6647 - submittal dated October 30, 2002 as supplemented September 16, 2003 (RC-03-0197) and TAC MC0108 - submittal dated July 11, 2003 as supplemented September 16, 2003 (RC-03-0196).

**5.0 RR-II-11, September 16, 2003 (RC-03-0197) submittal:**

**5.1 In the submittal, the alternate test section proposes using Code Case N-598 as an alternative to the selection percentages for the components subject to examination. Code Case N-598 is endorsed in Regulatory Guide 1.147, Revision 13. Explain the need for relief.**

**Response 5.1:**

Code Case N-598 can be applied as approved in RG 1.147 without relief. It is requested that Relief request RR-II-11 be withdrawn.

**South Carolina Electric & Gas Company (SCE&G)  
Virgil C. Summer Nuclear Station (VCSNS)  
Response to NRC Request for Additional Information (RAI)  
Regarding Inservice Inspection Relief Request  
RR-II-12**

TAC MB6647 - submittal dated October 30, 2002 as supplemented September 16, 2003 (RC-03-0197) and TAC MC0108 - submittal dated July 11, 2003 as supplemented September 16, 2003 (RC-03-0196).

**4.0 RR-II-12, September 16, 2003 (RC-03-0197) submittal:**

**4.1 In the submittal, the alternate test section (a) refers to examinations that had been previously deferred. Was the deferral for the first or second ISI interval? Provide the reference requesting/authorizing the deferral.**

**The deferral is associated with closure bolting examinations (Item B6.20). Does the deferral apply to the other items?**

**Response 4.1:**

The Code allowed "deferral" referenced was for the first Interval. The first Interval examinations were performed in accordance with the 1977 Edition, 1978 Summer Addenda. This edition of the code did not specifically address deferral of these items. The first interval Code examinations for category B-G-1 components were scheduled and performed in the final outage of the interval.

This request is associated with item numbers B6.10, B6.20, B6.40, B6.50 and B6.180.

**4.2 In the submittal, Table IWB-2500-1 for the 1989 Edition of the Code provides in Footnote (5) a condition that permits deferring the examination until the end of the interval. Does Footnote (5) apply to any of the Items in this request? Is/are there any ASME interpretation concerning deferring examination to the end of the interval?**

**Response 4.2:**

The items detailed in this relief do specifically have application to footnote 5. There are no pertinent interpretations that apply to this relief. SCE&G requests that Item (a) and proposed Alternate Test (a) be withdrawn as the 1989 Edition of the Code allows for deferral of this item.

**4.3 The subject of permitting deferral to the end of the interval has changed several times in ASME Code. For example, the ASME Code permitted deferring the examination through the 1983 Edition and again in the 1992 Edition with 1994 Addenda and later editions and addenda. Discuss the ASME Code change that resulted in the limitation on deferring examinations to the end of the interval and in Footnote (5) for the interval between the 1983 Edition and 1992 Edition with 1994 Addenda.**

**Response 4.3:**

The applicable Code for the first Interval was the 1977 Edition, 1978 Summer Addenda. The current Code for the second Interval is the 1989 Edition.

The Code has changed the presentation and content of the 2500 Tables during this time frame. The major change is the addition of the last column for deferral applicability. The 1977 Edition for the first interval contained limited verbiage concerning deferrals. The 1989 Edition has specific reference for deferrals for each item. There is some confusion as to the whether both items B6.20 and B6.30 examinations are required to be performed each interval. Allowing the deferral of item B6.20 to the end of the interval would clarify the scheduling examinations of the reactor vessel closure studs.

The VCNS second interval examinations for category B-G-1, items B6.10, B6.20, B6.40, B6.50 and B6.180 can be performed in accordance with the 1989 Edition of the code with the allowed deferral options of footnote 5.

**4.4 In the submittal, the relief request section (b) references Item B6.10 and the alternate test section proposes using Code Case N-627 as an alternative to the surface examination for Item B6.10. Code Case N-627 is endorsed in Regulatory Guide 1.147, Revision 13. Explain the need for relief.**

**Response 4.4:**

Code Case N-627 can be applied as approved in RG 1.147 without relief. It is requested that Relief request RR-II-12, Item (b) and proposed Alternate Test (b) be withdrawn. Also, SCE&G requests that Item (a) and proposed Alternate Test (a) be withdrawn as the 1989 Edition of the Code allows for deferral of this item.