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Vice President, Nuclear Operations
803.345.4214



November 11, 2004
RC-04-0184

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Ms. K. R. Cotton

Dear Sir/Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
REQUEST FOR ADDITIONAL INFORMATION – REQUEST FOR
EXEMPTION FOR CLADDING MATERIAL SPECIFIED IN 10CFR50.44
AND 10CFR50 APPENDIX K

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby provides a response to the subject request for additional information.

Requested information:

Discuss how data collected from the post-irradiation examinations of the Summer lead test assemblies (LTAs), as well as ongoing LTA and irradiation programs within the Westinghouse fleet, will be used to ensure that the fuel performance models remain conservative for these developmental cladding alloys, especially in subsequent cycles.

The current licensed fuel performance code predictions for the developmental claddings will be compared to post-irradiation examination data at VC Summer. If significantly adverse observations are found relative to predictions, the affected rod(s) will either be removed and the fuel assembly will be reconstituted with suitable replacement rods, or the entire fuel assembly will be removed from the following cycle(s) until the deviations are understood and addressed.

Based on the fact that the developmental alloys are similar to alloys already evaluated in a test reactor (Optimized ZIRLO tested in multiple commercial reactors) and substantial out of pile tests have been conducted on these materials, the actual performance of the developmental cladding will likely be bounded by the predictions obtained from the licensed fuel performance codes. No new design limits were established for these developmental claddings (i.e. the current design limits will be used).

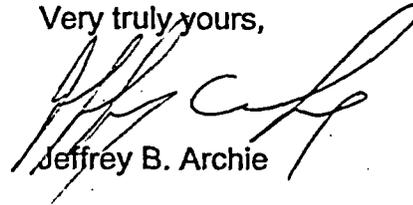
Where appropriate, concurrent data obtained from other LTA programs for the same developmental claddings will be factored into the assessment of the LTAs in VC Summer. Specifically, before the assemblies are reinserted, all available information will be reviewed to ensure existing design assumptions remain valid.

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Director, Office of Resource Management
0-C-04-3390
RC-04-0184
Page 2 of 2

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

Very truly yours,



Jeffrey B. Archie

JBA/RGS/mbb

c: N. O. Lorick
N. S. Carns
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RTS (0-C-04-3390)
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