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SCE&G®
A SCANA COMPANY

June 22, 2005
RC-05-0094

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

ATTN: Mr. R. E. Martin

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
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-9 AND RR-II-10 (C-02-3202)

Reference:

1. NRC (R. E. Martin) Letter to VCSNS, May 19, 2005, Request for Additional Information Regarding Relief Requests RR-II-09 and RR-II-10 (TAC NO. MC5750)
2. SCE&G Letter to NRC (Document Control Desk), RC-03-0221, dated October 23, 2003, 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 (C-02-3202)
3. NRC (K. R. Cotton) Letter to VCSNS, October 2, 2003, Request for Additional Information, ISI Relief Request RR-II-11 and RR-II-12 (TAC NO. MB6647)
4. 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

On September 16, 2003, South Carolina Electric & Gas Company (SCE&G) resubmitted a request for relief (Reference 4), from performing examination to the criteria of the American Society of Mechanical Engineers (ASME), Section XI. Subsequently, a Request for Additional Information (RAI) was issued on October 2, 2003, (Reference 3) and responded to by SCE&G on October 23, 2003 (Reference 2).

A telephone conference between the V. C. Summer Nuclear Station (VCSNS) NRR Project Manager, the NRC technical reviewer, and SCE&G was held on February 24, 2005. The technical reviewer discussed several areas of requests RR-II-9 and RR-II-10 that he felt needed more detail or clarification. These areas were addressed by responsible VCSNS personnel during this conference call and our response was determined acceptable by the reviewer. Due to the extent of the questions and the need to describe VCSNS programs for the response and in development of his safety evaluation, he requested that a docketed response be submitted

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by SCE&G. The NRC issued an RAI on May 19, 2005 (Reference 1) to provide the questions to SCE&G.

SCE&G hereby submits the attached response to the referenced RAI regarding relief requests RR-II-9 and RR-II-10.

Also, SCE&G has identified an error in Attachment II of Reference 4, the resubmittal for RR-II-10. In the table listing the respective welds, the Code Category for weld CGE-2-1110-1B-2 is listed incorrectly as "C-B". The correct Code Category for this weld should be "C-A".

If you have any questions or require additional information, please contact Mr. Ronald B. Clary at (803) 345-4757.

Very truly yours,

Jeffrey B. Archie

JT/JBA/dr

Attachments (2)

c: N. O. Lorick
S. A. Byrne
N. S. Carns
T. G. Eppink (w/o Attachments)
R. J. White
W. D. Travers
R. E. Martin
NRC Resident Inspector
Winston & Strawn
RTS (C-02-3202)
File (813.20)
DMS (RC-05-0094)

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-9

TAC MC5750 - submittal dated May 19, 2005

Regarding RR-II-9, please provide clarification whether the examinations were performed using procedures and personnel that were qualified in accordance with Appendix VIII of the ASME Code. Address whether the coverage achieved was obtained using qualified procedures in accordance with Appendix VIII and whether the coverage achieved was obtained using your best efforts to obtain the coverage required by the Code. Were any recordable indications detected? Provide a discussion on the impracticality of using radiograph testing to examine the subject welds.

Response:

RR-II-09
At the time the relative examinations were performed, we were committed to the base Edition of the 1989 ASME Section XI code, no Addenda. This edition did not require implementation of Appendix VII or VIII. During the conduct of these examinations we had not applied for nor implemented the "Risk Informed ISI Program" which in itself requires adherence to Appendix VII and/or VIII. Thus these examinations were not required to be performed using procedures or personnel qualified under the guideline of the aforementioned ASME Section XI Appendix. As a matter of site practice, the ultrasonic technicians who performed the listed piping examinations were qualified to an industry standard practice such as the EPRI, Intergranular Stress Corrosion Cracking (IGSCC) Qualification or the Performance Demonstration Initiative (PDI) Qualification programs.

Each weld in question was examined to the best effort possible with regards to the limitation and the design configuration. The use of multiple angles, dual access to the extent possible and better than half VEE beam path where feasible was utilized to interrogate each weld to the fullest extent practical.

There were no procedurally required recordable indications on any of the listed welds. The individual welds were not considered for examination by radiographic techniques because of the inherent high background radiation level of the component or large diameter and thickness of the component. Also radiographic techniques were not considered for any examination performed as a preservice inspection with the intent to model a set of baseline data for future testing. It has been the expectation that all welds be examined to the highest extent practical with qualified procedures and personnel in accordance with the ASME Code in effect at the time of examination. Where design configurations limit the achievable code required volume, it has not been the practice to disregard the component, but rather to interrogate it to the fullest insuring the component maintains a high level of quality and safety for the operating system.

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-10

TAC MC5750 - submittal dated May 19, 2005

Regarding RR-II-10, please clarify whether the examinations were performed using Section XI, Appendix III, or another subsection or article of the ASME Code to qualify the procedures and personnel. Were any recordable indications detected?

Response:

RR-II-10
At the time the relative examinations were performed, we were committed to the base Edition of the 1989 ASME Section XI code, no Addenda. The components listed in this relief are the shell to flange and the shell to head welds on the Class 2, Residual Heat Exchanger. Both of these welds have design limitations caused by the inlet and outlet nozzle reinforcing pads. A typical drawing of the interfering nozzle is shown as Figure IWC-2500-4 of the 1989 Edition of ASME Section XI. The examinations were performed with site approved procedures in accordance with ASME Section XI, paragraph IWA-2232, Appendix I, paragraph I-2200, and Appendix III. As a matter of site practice, the ultrasonic technicians who performed the listed examinations were qualified to an industry standard practice such as the EPRI, Intergranular Stress Corrosion Cracking (IGSCC) Qualification or the Performance Demonstration Initiative (PDI) Qualification programs. There were no recordable indications documented for this component during this inspection cycle or during previous examinations.

Note: In RR-II-10, in the table listing the respective welds, the Code Category for weld CGE-2-1110-1B-2 is listed incorrectly. The correct Code Category for this weld should be "C-A".