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803.345.4214

June 22, 2005
RC-05-0091

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
WITHDRAWAL OF LICENSE AMENDMENT REQUEST - LAR 02-2820
EMERGENCY CORE COOLING SYSTEMS - EXCLUSION OF SAFETY
INJECTION PUMPS FROM THE REQUIREMENT TO VENT ECCS PUMPS

Reference: Stephen A. Byrne (SCE&G) letter RC-03-0006 to Document Control Desk (NRC),
dated January 14, 2003

In the above referenced letter, South Carolina Electric & Gas Company (SCE&G) submitted a request for amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS). The proposed change would exclude the Charging/Safety Injection (SI) pumps and the Residual Heat Removal (RHR) pumps from the requirement to vent Emergency Core Cooling System (ECCS) pump casings located in TS section 4.5.2.b.2, eliminate the 31 day venting surveillance for the SI pumps, and add discussion for the exclusion in the technical basis of TS Section B 3/4.5.2.

The NRC Technical Reviewer for this request, Mr. Warren Lyon, visited VCSNS April 18 through April 20, 2005 to walk down the SI System and observe system high points. During his visit at VCSNS, he stated that the request, as submitted, did not address how any voids in the system piping high points would be identified periodically during plant operation. Without information on the methods used to verify that piping high points were full and defining the frequency of performing the verification, the request would not be accepted.

In preparation for the reviewer's visit, SCE&G Operations and Engineering personnel re-evaluated the request and determined that more detailed justification was warranted. Through discussion between the reviewer and SCE&G, ultrasonic testing (UT), as proposed by SCE&G, was determined to provide a reliable method of detecting void areas in piping high points and could be performed as frequently as needed. Further discussion led to the decision to evaluate this method for all of the ECCS piping.


Based on this determination and recommendations provided by the reviewer, SCE&G hereby withdraws the subject License Amendment Request. SCE&G intends to submit an updated request that includes discussion on performing UT to determine fluid level at the piping high points using the latest industry practices. This updated request will be submitted upon completion of the previously mentioned evaluation.

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

I certify under penalty of perjury that the information contained herein is true and correct.

6/22/05
Executed on


Jeffrey B. Archie

JT/JBA/dr

c: N. O. Lorick
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RTS (LAR 02-2820)
File (813.20)
DMS (RC-05-0091)