



Robert G. Sweet  
Manager, Nuclear Licensing  
803.345.4080

November 29, 2005

Rules and Directives Branch  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

10/05/05  
70 FR 58490  
(3)

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
COMMENTS ON DRAFT REGULATORY GUIDE DG-8028,  
CONTROL OF ACCESS TO HIGH AND VERY HIGH RADIATION AREAS  
IN NUCLEAR POWER PLANTS

RECEIVED  
2005 DEC - 6 PM 3:28  
RULES AND DIRECTIVES

South Carolina Electric & Gas Company (SCE&G) submits the following comments on draft Regulatory Guide DG-8028:

Overall, the proposed changes to Regulatory Guide 8.38 appear to reflect industry practices. The format is much better, but it would be more beneficial if the guidance framework had an even more graded approach to better reflect how the industry controls high radiation areas, technical specification high radiation areas, and very high radiation areas. The guidance does not emphasize many distinct differences in the controls for high radiation and technical specification high radiation areas.

Section 1.5 *Physical Controls*

With regard to the second sentence in this paragraph, will the use of signs and ribbon/rope only be sufficient enough to meet the intent of such a barrier? Or will licensees be required put up physical barriers (i.e., fencing) around all high radiation areas?

Also, the "6 foot" specification has been omitted. Will this create enforcement issues over 6-foot tall versus 2-meter tall fencing?

Section 2.2 *Positive Access Control*

Do the access control requirements apply to high radiation areas (i.e., >100 mrem/hr) that are normally "maintained locked" or to actual "locked high radiation areas" as in Tech Spec (i.e., > 1000 mrem/hr) high radiation areas?

Item (5) requires all authorized entries and exits into high radiation areas to be documented. This is not a new requirement, but what suffices as documentation? Would RWP log in/out records suffice?

SCE&G Review Complete

E-RDS-ADM-03  
Add = H. Karagiannis

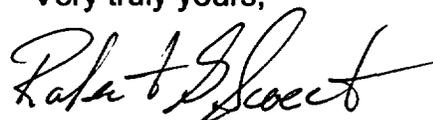
Template = ADM-013

(HXK)

Rules and Directives Branch  
DG-8028  
RC-05-0199  
Page 2 of 2

SCE&G appreciates the opportunity to comment on this draft regulatory guide. Should you have any questions, please call Ms. Susan B. Reese at (803) 345-4591.

Very truly yours,



Robert G. Sweet

SR/RGS/sr

c: N. O. Lorick  
S. A. Byrne  
N. S. Carns  
G. S. Champion  
R. J. White  
W. D. Travers  
R. E. Martin  
NRC Resident Inspector  
Document Control Desk  
K. M. Sutton  
NSRC  
RTS (C-05-4234-2)  
File (811.05)  
DMS (RC-05-0199)