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SCE&G®
A SCANA COMPANY

December 21, 2007
RC-07-0184

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 (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
SCE&G ACTION COMMITMENTS REGARDING RESPONSE TO NRC QUESTIONS REGARDING RESPONSE TO GENERIC LETTER 96-06 (TAC NO. M96872)

References:
1. J. B. Archie (SCE&G) Letter to Document Control Desk (NRC), Response to NRC Questions Regarding Response to Generic Letter 96-06 (TAC NO. M96872), October 25, 2007
2. R. E. Martin (NRC) Letter to J. B. Archie (SCE&G), Virgil C. Summer Nuclear Station - Request for Additional Information Regarding Generic Letter 96-06 (TAC NO. M96872), August 1, 2007

South Carolina Electric & Gas Company (SCE&G) received an NRC letter dated August 1, 2007 (Reference 2), presenting a request for additional information (RAI) regarding the SCE&G response to Generic Letter (GL) 96-06. SCE&G reviewed these questions in consideration of the activities conducted to address the GL 96-06 issues and provided a response through a letter of October 25, 2007 (Reference 1).

A telephone conference call was held between the NRC VCSNS Project Manager, the NRC technical reviewer, and VCSNS personnel on November 14, 2007 to discuss the SCE&G response.

In response to the telephone conference of November 14, 2007, SCE&G commits to make the following changes to VCSNS plant documentation as a result of the plant modifications to resolve GL 96-06 water hammer issues in the Service Water (SW) system.

Under 10CFR50.59, various procedures, Technical Specification Bases, and FSAR will be changed to ensure the licensing and design bases reflect GL 96-06 commitments.

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The following is a recap of the items discussed:

- *Technical Specification (TS) Bases- Section 3/4.6.2.3 will be changed to reflect mitigation of water hammer in response to GL 96-06.*

- *Inservice Testing (IST) of ASME Code valves – IST procedures will be revised to satisfy TS 4.0.5 requirement 4.0.5; Frequency – quarterly test requirement - verification of valve 3107A(B) stroke timing; Test Description - valve will be energized to close and stroke time will be obtained. The stroke duration will be compared with predetermined limits. Commitment notation will be added to the procedure in accordance with Station Administrative Procedure 605, Procedure/Commitment Accountability Program (P/CAP).*

- *Surveillance testing – Surveillance test procedures will be revised to satisfy TS 4.8.1.1.2.g.4 requirement -simulate loss of offsite power (LOOP); Frequency - 18 months, normally during an outage; Test Requirement - verification that valve 3107A(B) will close upon initiation of LOOP; Test Description - during an outage as part of safe guards testing, the Reactor Building Cooling Units (RBCUs) are aligned with the SW system and a LOOP is simulated. During this simulation, the valve will be observed to assure that it begins to close upon initiation of the LOOP. Commitment notation will be added to the procedure (P/CAP).*

- *Surveillance testing – Surveillance test procedures will be revised to satisfy TS 4.6.2.3.4 requirement - verify automatic operation of Service Water Booster Pump (SWBP) on Safety Injection (SI); Frequency - 18 months, normally during an outage; Test Requirement - verification of interlocks that prevent SWBP from starting if valve 3107A(B) is not closed; Test Description - specific leads will be lifted to simulate valve 3107A(B) to be not in the closed position. Upon receipt of the signal to energize the SWBP, it will be observed that the pump does not start. Commitment notation will be added to the procedure (P/CAP).*

- *Emergency Operating Procedure (EOP) - Change Requirement - in the event of a failure of valve 3107A(B) to close on demand, to prevent a water hammer condition at the time 3107A(B) does eventually close. Change Description - if immediately after a LOOP were to occur with the RBCUs aligned with the SW system and a SWBP failed to start with 3107A(B) not closed, steps will be added for the control room staff to place the SWBP in pull-to-lock. Commitment notation will be added to the procedure (P/CAP).*

- *Service Water System Operating Procedure (SOP) - Change Requirement - to provide a means of recovery and train restoration after the failure of 3107A(B) to close on demand; Change Description - steps for the recovery from the condition noted above in EOP to fill the RBCU downstream piping will be added to the procedure. Commitment notation will be added to the procedure (P/CAP).*

- *Appropriate FSAR sections will be revised (required as part of the design change process).*

All procedure changes will be completed in order for the post-modification testing to be completed during the spring 2008 refueling outage, RF-17.

Changes to the Technical Specification Bases and the FSAR will be completed within 90 days of the completion of RF-17.

If you have any questions or require additional information, please contact Mr. Bruce Thompson at (803) 931-5042.

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

12/21/07
Executed on

Jeffrey B. Archie
Vice President, Nuclear Operations

GAR/JBA/jt
Attachment

c: K. B. Marsh
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