

Rulemaking Comments

From: ROBERTSON, GEORGE A [GROBERTSON@scana.com]
Sent: Tuesday, July 06, 2010 1:32 PM
To: Rulemaking Comments
Cc: GATLIN, THOMAS D; THOMPSON, BRUCE L; WEATHERSBY, JASON H; DOBSON, DAVID G; RAILEY, DONNA W; ROBERTSON, GEORGE A
Subject: Docket No. 50/395; NRC-208-0554

In Federal Register 75FR24324 dated 5/4/10 under Section IV, "Paragraph-by-Paragraph Discussion," the NRC proposes to revise the Inservice Inspection Requirements of 10 CFR 50.55a(g)(2), (g)(3)(i), (g)(3)(ii), the Introductory Text of (g)(4), (g)(4)(i) and (g)(4)(ii) as follows: The NRC proposes to revise paragraphs (g)(2), (g)(3)(i), (g)(3)(ii), (g)(4), (g)(4)(i) and (g)(4)(ii) to require that the provisions in Subsection ISTD of the ASME OM Code, and the optional ASME code cases listed in Regulatory Guide 1.192, be used for the ISI of snubbers. The introductory text of paragraph (g)(4) would be revised to require that licensees use the provisions for examination and testing of snubbers in Subsection ISTD of the ASME OM Code.

SCE&G Comment:

In lieu of the provisions in Subsection ISTD of the ASME OM Code and optional ASME code cases, snubber examination and testing should be in accordance with plant Technical Specifications. SCE&G's V. C. Summer Nuclear Station (VCSNS) Technical Specifications are very detailed in terms of snubber examination and testing, including inspection types, visual inspection acceptance criteria, functional tests, functional test acceptance criteria, functional test failure analysis, functional testing of repaired or replaced snubbers, snubber seal replacement program, snubber visual inspection interval and number of unacceptable snubbers. The introductory text and other applicable sections should state that licensees use the provisions for examination and testing of snubbers in Subsection ISTD of the ASME OM Code or the requirements in plant Technical Specifications.

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