



October 12, 2011
RC-11-0158

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

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST - LAR (11-04569)
Technical Specification Change to Extend
Integrated Leak Rate Test Interval One-Time

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, requests Nuclear Regulatory Commission (NRC) review and approval to amend Operating License NFP-12 for Virgil C. Summer Nuclear Station (VCSNS). The proposed change would allow for a one time extension to the ten-year frequency of the VCSNS containment leakage rate test (e.g., Integrated Leak Rate Test [ILRT] or Type A test) that is required by Technical Specification (TS) 6.8.4(g). The proposed change would permit the existing ILRT frequency to be extended from ten-years to approximately 10.9 years.

The proposed revision would avoid the necessity of performing a Type A test twelve months prior to the 10th year anniversary of the completion of the last Type A test (October 15, 2013). If granted, this revision would extend the period from 120 months (10 years) to no longer than approximately 130 months between the successive tests. In terms of refueling outages, this extension would move the performance of the next ILRT from RF-20 to RF-21 (April 19th, 2014). The last VCSNS ILRT was completed on October 15, 2003. The next ILRT is required (by TS 6.8.4.(g)) to be performed no later than October 15, 2013, which is approximately twelve months after the conclusion of VCSNS RF-20. The proposed change would encompass the currently scheduled completion of RF-21, approximately six months beyond the present frequency. This request is for 10 months which bounds the time to reach RF-21. This additional time is requested to allow flexibility in the schedule to address any potential extended down powers or forced outages or unforeseen issues that may arise during an outage without having to revise this request.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that the change involves no significant hazards consideration. The bases for these determinations are included in the attached submittal. The proposed change does not include any new commitments. SCE&G requests approval of the proposed amendment by August 1, 2012. Once approved, the amendment shall be implemented within 60 days.

A017
NRC

The VCSNS Final Safety Analysis Report has been reviewed and requires no revisions.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated South Carolina Official.

This proposed change has been reviewed and approved by both the VCSNS Plant Safety Review Committee (PSRC) and the VCSNS Nuclear Safety Review Committee (NSRC).

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

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

10-12-11
Executed on

Tom Datt
Thomas D. Gatlin

SBQ/TDG/wm

Attachments: 4

- I. Analysis of Proposed Technical Specification Change
- II. Marked Up TS Page
- III. Retyped TS Page
- IV. Commitment Page

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ATTACHMENT I

Analysis of Proposed Technical Specification Change

Technical Specification Change to Extend Integrated Leak Rate Test Interval One-Time

1.0 DESCRIPTION

This letter is a request to amend Facility Operating License No. NPF-12 for the Virgil C. Summer Nuclear Station, Unit 1. The proposed change is to allow for a single extension to the 10-year frequency of the VCSNS next containment leak rate test (e.g., Integrated Leak Rate Test [ILRT] or Type A test). With the approval of the proposed change, the existing ILRT frequency would be revised from 120 months (10 years) to approximately 130 months.

The proposed revision would avoid the necessity of performing a Type A test twelve months prior to the 10th year anniversary of the completion of the last Type A test (October 15, 2003) during RF-20. If granted, this revision would extend the period from 120 months (10 years) to approximately 130 months between the successive tests. In terms of refueling outages, this extension would move the performance of the next ILRT from RF-20 to RF-21.

Extending the ILRT due date from October 15, 2013, to no later than the plant restart from RF-21 is a cost beneficial licensing change. The ILRT imposes a significant expense and hardship to the plant. It will also reduce concerns associated with incorporating the ILRT into RF-20, provide time to plan and incorporate the containment ILRT in RF-21 in the spring of 2014, and prevent a forced outage. RF-21 is currently scheduled to start approximately six months after the current ILRT due date. This request for a 10 month extension will bound the time to reach RF-21 and provide flexibility in the schedule to address any extended down powers, forced outages or unforeseen issues that may arise during that outage without having to revise this request. Including the ILRT in RF-20, which is scheduled for October 2012 (approximately 12 months prior to ILRT due date) could impact the overall length of the outage.

2.0 PROPOSED CHANGE

VCSNS TS 6.8.4(g), "Containment Leakage Rate Testing Program," states, "A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions." This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995; NEI 94-01,

“Industry Guideline for Performance-Based Option of 10 CFR50, Appendix J,” Revision 0; ANSI/ANS-56.8-1994, “Containment System Leakage Testing Requirements”; as modified by approved exceptions.

The proposed change would revise this section by adding the following phrase at the end of the last sentence... “Containment System Leakage Testing Requirements”; as modified by approved exceptions that the next Type A test performed after the October 15, 2003 Type A test shall be performed no later than August 15, 2014.

3.0 BACKGROUND

In 1995, the NRC amended 10 CFR 50, Appendix J, “Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors,” to provide a performance-based Option B for the containment leakage testing requirements. Option B requires that test intervals for Type A, Type B, and Type C testing be determined by using a performance-based approach. Performance-based test intervals are based on consideration of the operating history of the component and resulting risk from its failure. The amendment is also aimed at improving the focus of the body of regulations by eliminating prescriptive requirements that are marginal to safety and by providing licensees greater flexibility for cost-effective implementation methods for regulatory safety objectives.

Type A tests focus on verifying the leakage integrity of a passive containment structure and are performed during a period of reactor shutdown. Types B and C testing focus on assuring that containment penetrations are essentially leak tight. These tests collectively satisfy the requirements of 10 CFR 50, Appendix J, and Option B.

The purposes of the tests are to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications (TS) or associated bases; and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

Regulatory Guide (RG) 1.163, “Performance-Based Containment Leak Test Program,” dated September 1995, was developed as a method acceptable to the staff for implementing Option B. This RG states that the Nuclear Energy Institute (NEI) guidance document, NEI 94-01, Revision 1j, “Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J,” provides methods acceptable to the staff for complying with Option B.

RG 1.163 specifies an extension in Type A frequency to at least one test in ten years based upon two consecutive successful tests and risk history.

By letter dated November 2, 1995, the NRC transmitted to NEI the final agreed upon TS that would serve as the model for licensees to develop plant-specific TS in preparing amendment requests to implement Option B.

By letter dated April 16, 1996, South Carolina Electric and Gas (SCE&G) submitted a TS change request concerning the implementation of 10 CFR 50, Appendix J, Option B. In the Safety Evaluation (SE) approving this request (letter dated October 2, 1996), the NRC noted the proposed TS changes are in compliance with the requirements of 10 CFR 50, Appendix J, Option B, and consistent with the guidance in RG 1.163.

With the approval of the TS change request, VCSNS transitioned to a performance based ten year frequency for the Type A tests.

Section 9.1 of NEI 94-01, Revision 1j specifies that Type A testing should be consistent with standard scheduling practices for Technical Specifications Required Surveillances. It recommends intervals for Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors. The position of Section 9.1 was re-affirmed in the response to Question 37 in the Appendix J Workshop (NEI Appendix J Workshop, Questions and Answers, dated December 7-8, 1995) Questions and Answers issued March 19, 1996, by the NEI Task Force on Appendix J stated below:

Question 37-B: Also, if a 10 year Type A interval falls between refuel outages, how long may the interval be extended?

Response 37-B: NEI 94-01, Section 9.1, provides for extending the intervals for the Type A tests by up to 15 months, not 25%. This option should be used only in cases where refueling schedules have been changed to accommodate other factors. The Type A test should be scheduled for the outage preceding the 10 year anniversary of the last Type A test. The purpose of this restriction was to prevent a licensee from arbitrarily adding the 15 months on to every testing interval, which would effectively change the interval permanently to 11.25 years.

Based on a conservative application of NEI 94-01, Revision 1j and the published Questions and Answers, VCSNS believes that the 15 month extension would not apply in this particular circumstance. Accordingly, due to this conservative interpretation, VCSNS is requesting an amendment to its TS to extend the test frequency one time.

4.0 TECHNICAL ANALYSIS

Primary containment provides an essentially leak-tight barrier against the uncontrolled release of radioactivity into the environment following a design basis accident. The testing requirements of 10 CFR 50, Appendix J, provide assurance that leakage from the primary containment, including systems and components that penetrate the containment, does not exceed the allowable leakage values specified in the TS.

The proposed change to extend the ILRT surveillance interval through the end of the RF-21 refueling outage is justified based on the results of previous ILRTs and containment inspection programs.

4.1 Previous ILRT Results

The two most recent ILRT test results confirm that the VCSNS containment structure leakage is acceptable, with considerable margin, with respect to the TS acceptance criterion of 0.20% of containment air weight per 24 hours at the design basis loss of coolant accident pressure.

The performance leakage rates are calculated in accordance with NEI 94-01, Section 9.1.1. The performance leakage rate includes the Type A Upper Confidence Limit (UCL) at 95% plus the as-left minimum pathway leakage rate for all Type B and C pathways not in service, isolated, or not lined up in their test position. In addition, leakage pathways that were isolated during the performance of the test because of excessive leakage are included in the test results by adding the as-found minimum pathway leakage rate to the Type A test 95% UCL. The performance leakage rate does not include leakage savings (i.e., improvements to Type B and C components made prior to the Type A test).

The VCSNS April 1993 periodic Type A test using the Mass Point method calculated at the 95% UCL resulted in a leakage rate of 0.1298 %wt / day. The minimum pathway leakage rate for Type B and C pathways not in service (considering water level corrections) was 0.0070 %wt / day. Therefore, the performance leakage rate was $0.1298 + 0.0070 = 0.1368$ %wt / day.

The VCSNS October 2003 periodic Type A test using the Total Time method calculated at the 95% UCL resulted in a leakage rate of 0.0581 %wt / day. The minimum pathway leakage rate for Type B and C pathways not in service and water level corrections was 0.0173 %wt / day. The Volume Change Correction factor is -0.00051 %wt / day. Therefore, the performance leakage rate was $0.0581 + 0.0173 - 0.00051 = 0.0749$ %wt / day.

These results show that there is considerable margin compared to the maximum allowable leakage rate for V. C. Summer of 0.20 %wt / day at a pressure of 45.1 psig. Based upon these two consecutive successful tests, and the approval of this License Amendment, the current ILRT interval requirement for VCSNS will be approximately 10.9 years.

No modifications that require a Type A test are planned prior to RF-21, when the next Type A test will be performed under this proposed change. Any unplanned modifications to the containment prior to the next scheduled Type A test would be subject to the special testing requirements of Section IV.A of 10 CFR 50, Appendix J. There have been no pressure or temperature excursions in the containment which could have adversely affected containment integrity. There is no anticipated addition or removal of plant hardware within containment which could affect leak-tightness.

4.2 Containment Inspection Programs and Results

VCSNS has established procedures for performing visual examinations of the accessible surfaces of the containment for detection of structural problems. RG 1.163, Regulatory Position C.3 specifies that these examinations should be conducted prior to initiating a Type A test and during two other outages before the next Type A test if the interval for the Type A test has been extended to ten years, in order to allow for early detection of evidence of structural deterioration. These visual examinations have been completed, with no significant defects noted to date.

The ASME Section XI Program requires that the steel containment vessel be examined in accordance with the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWE, and associated modifications and limitations imposed by 10 CFR 50.55a(b)(2). Details of the containment inservice inspection program are described in the VCSNS Containment Inservice Inspection (CISI) found in our Technical Specification Bases 3/4 6-2.

The 8th Period (30th year) IWL surveillance including the tendon pre-stress system and containment concrete inspections were completed during RF-19 in March-April 2011. The inspections were done in accordance with ASME Section XI and the results of the inspections confirm that there is no abnormal degradation of the containment and that the vertical, horizontal, and dome tendon groups are conservatively projected to maintain more than the required minimum average tendon force for the particular group until the next regularly scheduled surveillance. The VCSNS program to perform these surveillance examinations at a 5 year or less inspection interval continues to be an acceptable and appropriate program to monitor and maintain these structures to ensure their capability to perform the safety related design basis containment function.

The testing frequency for Type B and C tests is not affected by this requested amendment to extend the Type A test interval from 120 months (10 years) to approximately 130 months.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements / Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. 10 CFR 50.54(o) requires primary reactor containments for water-cooled power reactors to be subject to the requirements of Appendix J to 10 CFR 50, "Leakage Rate Testing of Containment of Water Cooled Nuclear Power Plants." Appendix J specifies containment leakage testing requirements, including the types of tests required to ensure the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. In addition, Appendix J discusses leakage rate acceptance criteria, test methodology, frequency of testing and reporting requirements for each type of test.

As discussed earlier, RG 1.163 endorses NEI 94-01, Revision 0 with certain modifications and additions.

The adoption of the Option B performance-based containment leakage rate testing for Type A testing did not alter the basic method by which Appendix J leakage rate testing is performed; however, it did alter the frequency at which Type A, B, and C containment leakage tests must be performed. Under the performance-based option of 10 CFR 50, Appendix J, test frequency is based upon an evaluation that reviews "as-found" leakage history to determine the frequency for leakage testing which provides assurance that leakage limits will be maintained. The change to the Type A test frequency did not directly result in an increase in containment leakage. Similarly, the proposed change to the Type A test frequency will not directly result in an increase in containment leakage.

Based on the considerations above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will continue to be conducted in accordance with the site licensing basis, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

In conclusion, SCE&G has determined that the proposed change does not require any exemptions or relief from regulatory requirements, other than the TS, and does not affect conformance with any regulatory requirements / criteria.

5.2 No Significant Hazards Consideration

A change is proposed to the Virgil C. Summer, Unit 1 Technical Specifications to extend the Type A test required by TS 6.8.4(g) by approximately 10 months for a one-time interval. SCE&G has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR50.92, "Issuance of Amendment," as described below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed exemption involves a one-time extension to the current interval for Type A containment testing. The current test interval of 120 months (10 years) would be extended on a one-time basis to no longer than approximately 130 months from the last Type A test. The proposed extension does not involve a physical change to the plant or a change in the manner in which the plant is operated or controlled. The containment is designed to provide an essentially leak tight barrier against the uncontrolled release of radioactivity to the environment for postulated accidents. As such, the reactor containment itself and the testing requirements invoked to periodically demonstrate the integrity of the reactor containment exist to ensure the plant's ability to mitigate the consequences of an accident, and do not involve the prevention or identification of any precursors of an accident. Therefore, this proposed extension does not involve a

significant increase in the probability of an accident previously evaluated nor does it create the possibility of a new or different kind of accident.

The integrity of the reactor containment is subject to two types of failure mechanisms which can be categorized as (1) activity based and (2) time based. Activity based failure mechanisms are defined as degradation due to system and / or component modifications or maintenance. Local leak rate test requirements and administrative controls such as configuration management and procedural requirements for system restoration ensure that containment integrity is not degraded by plant modifications or maintenance activities. The design and construction requirements of the containment itself combined with the containment inspections performed in accordance with ASME, Section XI, the Maintenance Rule, and Licensing commitments serve to provide a high degree of assurance that the containment will not degrade in a manner that is detectable only by a Type A test. Based on the above, the proposed extension does not involve a significant increase in the consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed revision to the TS involves a one-time extension to the current interval for Type A containment testing. The reactor containment and the testing requirements invoked to periodically demonstrate the integrity of the reactor containment exist to ensure the plant's ability to mitigate the consequences of an accident and do not involve the prevention or identification of any precursors of an accident. The proposed TS change does not involve a physical change to the plant or the manner in which the plant is operated or controlled. Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change to the TS involves a one-time extension to the current interval for Type A containment testing. The proposed TS change does not involve a physical change to the plant or a change in the manner in which the plant is operated or controlled. The specific requirements and conditions of the Primary Containment Leak Rate Testing Program, as defined in the TS, exist to ensure that the degree of reactor containment structural integrity and leak-tightness that is considered in the plant safety analysis is maintained. The overall containment leak rate limit specified by TS is maintained. The proposed change involves only the extension of the interval between Type A containment leak rate tests. The proposed surveillance interval extension is bounded by the 15 month extension currently authorized within NEI 94-01, Revision 0.

Type B and C containment leak rate tests will continue to be performed at the frequency currently required by TS. Industry experience supports the conclusion that Type B and C testing detects a large percentage of containment leakage paths and that the percentage of containment leakage paths that are detected only by Type A testing is small. The containment inspections performed in accordance with ASME, Section XI and the Maintenance Rule serve to provide a high degree of assurance that the containment will not degrade in a manner that is detectable only by Type A testing. The combination of these factors ensures that the margin of safety that is in plant safety analysis is maintained. The design, operation, testing methods and acceptance criteria for Type A, B, and C containment leakage tests specified in applicable codes and standards will continue to be met, with the acceptance of this proposed change, since these are not affected by changes to the Type A test interval. Therefore, the proposed TS change does not involve a significant reduction in a margin of safety.

Based on the above, SCE&G concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

6.0 Environmental Considerations

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 PRECEDENCE

This request is similar in nature to the license amendment authorized by the NRC for Arkansas Nuclear One, Unit No.2 on July 20, 2009 (TAC No.MD9502), Vermont Yankee Power Station on June 2, 2003 (TAC No.MB6507), and Nine Mile Point Unit 1 on December 29, 1994 (Accession Number 9501090321).

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)

ATTACHMENT II

PROPOSED TECHNICAL SPECIFICATION CHANGE (MARK-UP)

Attachment to License Amendment No. XXX
To Facility Operating License No. NPF-12
Docket No. 50-395

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

6-12b

Insert Pages

6-12b

ADMINISTRATIVE CONTROLS

f. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measures of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications to the monitoring program are made if required by the results of the census; and
- 3) Participation in an Inter-laboratory Comparison Program to ensure that independent checks on the precision and accuracy of measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

g. Containment Leakage Rate Testing Program

A program shall be established to implement leakage rate testing of the containment system as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", dated September 1995; NEI 94-01, "Industry Guideline for Performance-Based Option of 10 CFR 50, Appendix J", Revision 0; ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements"; ~~as modified by approved exemptions.~~

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 45.1 psig.

The maximum allowable containment leakage rate, L_a , at P_a , is 0.20 percent by weight of the containment air per 24 hours.

Leakage rate acceptance criteria are:

- 1) Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ for Type A tests;

as modified by approved exceptions that the next Type A test performed after the October 15, 2003 Type A test shall be performed no later than August 15, 2014.

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)

ATTACHMENT III

PROPOSED TECHNICAL SPECIFICATION CHANGE (RETYPE)

ADMINISTRATIVE CONTROLS

f. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measures of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications to the monitoring program are made if required by the results of the census; and
- 3) Participation in an Inter-laboratory Comparison Program to ensure that independent checks on the precision and accuracy of measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

g. Containment Leakage Rate Testing Program

A program shall be established to implement leakage rate testing of the containment system as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995; NEI 94-01, "Industry Guideline for Performance-Based Option of 10 CFR 50, Appendix J," Revision 0; ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements"; as modified by approved exceptions that the next Type A test performed after the October 15, 2003 Type A test shall be performed no later than August 15, 2014.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 45.1 psig.

The maximum allowable containment leakage rate, L_a , at P_a , is 0.20 percent by weight of the containment air per 24 hours.

Leakage rate acceptance criteria are:

- 1) Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ for Type A tests;

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)

ATTACHMENT IV

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by SCE&G, Virgil C. Summer Nuclear Station in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Bruce L. Thompson, Manager, Nuclear Licensing, (803) 931-5042.

COMMITMENT	Due Date/Event
None.	N/A