



May 16, 2013
RC-13-0072

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION UNIT 1 (VCSNS)
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST - LAR 12-03567
Application to Revise Technical Specifications to Adopt TSTF-510,
Supplement (TAC NO. MF1384)

Reference: 1. SCE&G Letter, "License Amendment Request - LAR 12-03567
Application to Revise Technical Specifications to Adopt TSTF-510,
Revision to Steam Generator Program Inspection Frequencies and
Tube Sample Selection, Using The Consolidated Line Item
Improvement Process," dated April 2, 2013 (RC-13-0047)
[ML13095A106]

2. NRC Letter, "Virgil C. Summer Nuclear Station, Unit 1 –
Supplemental Information Needed For Acceptance Of Requested
Licensing Action Concerning Technical Specification Task Force
Traveler -510 (TAC NO. MF1384) (RC-13-0047)" [ML13122A136]

Pursuant to 10CFR50.90, South Carolina Electric & Gas Company (SCE&G), acting for itself and as an agent for South Carolina Public Service Authority, submitted a License Amendment Request to adopt TSTF-510 Revision 2. The proposed amendment would modify Technical Specification (TS) requirements regarding steam generator tube inspections and reporting. During a conference call on April 30, 2013, the NRC stated that they were issuing a Non-Acceptance With Opportunity to Supplement because the application lacked information in three specific areas. Attachment 1 provides the supplemental information requested to support the proposed changes.

If you should have any questions, please contact Mr. Bruce L. Thompson at (803) 931-5042.

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I declare under penalty of perjury that the foregoing is true and correct.

5/14/2013
Executed On

Tom Deth
Thomas D. Gatlin

JMG/TDG/ts

Attachment:

Request for Additional Information

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PRSF (RC-13-0072)

**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12**

ATTACHMENT

REQUEST FOR ADDITIONAL INFORMATION

1.0 DESCRIPTION

This letter provides South Carolina Electric & Gas Company's (SCE&G) response to the Request for Additional Information (RAI) documented for License Amendment submittal dated April 2, 2013 (ADAMS Accession No. ML13095A106) for License Amendment Request – LAR 12-03567. The proposed change revises Technical Specification (TS) 3.4.5, "Steam Generator Tube Integrity," 6.8.4.k, "Steam Generator (SG) Program," and 6.9.1.12, "Steam Generator Tube Inspection Report."

The proposed amendment was issued consistent with TSTF-510, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection" and the model application. Per conversations with the Nuclear Regulatory Commission (NRC), the submittal lacked information in three specific areas that would be needed to support acceptance of the model application.

2.0 ASSESSMENT

- 2.1 *The model safety evaluation for TSTF-510 contains a discussion on General Design Criteria (GDC) requirements, specifically, GDCs 14, 15, 30, 31, and 32, which a licensee needs to consider in determining the applicability of TSTF-510, or a licensee needs to provide a discussion of its plant-specific GDCs equivalent to those specified in the model SE. The licensee's application fails to provide such information.***

VCSNS FSAR section 3.1 describes how the station meets the "General Design Criteria for Nuclear Power Plants" specified in Appendix A to 10CFR50. SCE&G has reviewed TSTF-510, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection," [ML110610350] and the

Model Safety Evaluation dated October 19, 2011 [ML112101513] as identified in the Federal Register Notice of Availability, dated October 27, 2011 (76 FR 66763). As described in the subsequent paragraphs, SCE&G has concluded that the justifications presented in TSTF-510 and the Model Safety Evaluation prepared by the Nuclear Regulatory Commission (NRC) staff are applicable to VCSNS Unit 1 and justify this amendment for incorporation of the changes to the VCSNS TS.

TSTF-510 revision 2 contains a discussion on General Design Criteria (GDC) within section 5.2, Applicable Regulatory Requirements/Criteria. VCSNS has reviewed the TSTF-510 Revision 2 section 5.2 and concurs with the evaluation of this section and the applicability to VCSNS Steam Generator (SG) Program. Based on the TSTF-510 Revision 2:

“There are no changes to the SG design that impact this general design criteria. The evaluation performed in [TSTF-510 Revision 2] Section 4.0 [Technical Analysis] concludes that the proposed change will continue to comply with this regulatory requirement.”

Also,

“The Steam Generator Program required by the proposed technical specification establishes performance criteria, repair criteria, repair methods, inspection periods and the methods necessary to meet them. These requirements provide reasonable assurance that tube integrity will be met in the interval between SG inspections.”

VCSNS followed the Model Application [ML110610350] for adoption of TSTF-510 therefore, this information was not directly reflected within the approved application but is implied within section 2 of the NRC approved Adoption Model.

2.2 *The Model SE provides three versions of SEs for three different types of SG tube alloys. The licensee does not provide such information on its SG tube alloy type material.*

VCSNS Steam Generators (SG) are described within VCSNS FSAR section 5.5.2.2 and the tubing material is thermally heat treated Alloy 690 (690TT). SCE&G is not proposing any technical variations or deviations from the TS changes described in TSTF-510, Revision 2, or the applicable parts of the NRC staff's Model Safety Evaluation. The original steam generators were replaced during the Refuel 8 outage, approximately September 1994, with Westinghouse Delta-75 steam generators. Steam generator materials of construction are listed within FSAR Table 5.2-8. All materials are selected and fabricated in accordance with the requirements of the ASME Code, Section III, and Code Case N-20-3.

2.3 *The revision 2 of TSTF-510 makes reference of TSTF-449. The licensee does not provide discussion or indication of using Standard Technical Specification Change Traveler, TSTF-449 Rev. 4 "Steam Generator Tube Integrity."*

The current Steam Generator Program is based on TSTF-449 Revision 4 and was applied to VCSNS TS by Amendment 179 [ML071070384].