



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 6, 2013

Mr. Thomas D. Gatlin
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88, Mail Code 800
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 - REQUEST FOR
ADDITIONAL INFORMATION CONCERNING INTEGRATED LEAK RATE
TESTING (TAC NO. MF1385)

Dear Mr. Gatlin:

By letter dated April 3, 2013 (Agencywide Documents Access and Management System ADAMS) Accession No. ML130950121), South Carolina Electric & Gas Company, requested changes to the Technical Specifications (TSs) for the Virgil C. Summer Nuclear Station, Unit 1 (VCSNS). The proposed change would allow for the extension of the 130-month frequency of the VCSNS containment leakage rate test (e.g., Integrated Leak Rate Test [ILRT] or Type A test) that is required by TS 6.8.4(g) to 15 years on a permanent basis. With the approval of the proposed change, the existing ILRT frequency would be revised from 10.9 years to 15 years. In accordance with the guidance in NEI 94-01, Revision 3-A, the proposed change would permit the existing primary containment ILRT frequency to be extended from 10 years to no longer than 15 years on a permanent basis.

A response to the enclosed Request for Additional Information is needed before the Nuclear Regulatory Commission staff can complete the review. Please provide a response within 30 days of the issuance of this letter.

Sincerely

A handwritten signature in cursive script that reads "Robert E. Martin".

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

EXTENSION OF INTEGRATED LEAK RATE TESTING FREQUENCY

SOUTH CAROLINA ELECTRIC & GAS COMPANY

VIRGIL C. SUMMER NUCLEAR STATION, UNIT 1

DOCKET NO. 50-395

Containment

1. Subsection IWE-1240, to the American Society of Mechanical Engineers Boiler & Pressure Vessel Code Section XI, requires that surface areas likely to experience accelerated degradation and aging require augmented examinations. Describe any identified areas that require performance of augmented inspections in accordance with IWE-1240.

Mechanical Engineering

1. In order to assess the implementation of the Type B and Type C local leak rate testing program, the licensee is requested to provide the following:
 - (a) In the Reference, Attachment V table titled, "VCSNS Failed LLRTs 2003 – 2012" there are twelve "As Left" Test Types with higher leakage rates than the acceptance criteria. Explain why the "As Left" leakage rates were acceptable.
 - (b) Attachment V, from the Reference, contains a summary table of local leak rate tests (LLRTs) that did not meet the required acceptance criteria. Describe the causes and corrective actions taken to address the LLRTs that did not demonstrate acceptable performance in accordance with the Containment Leakage Rate Program.
 - (c) List the length of the test interval for each failed LLRT in the Attachment V table of the Reference. Describe the basis for the length of each failed test interval, as required for the containment leakage rate testing program per the current 10 CFR 50, Appendix J Testing Program Plan using Regulatory Guide (RG) 1.163 (September 1995). In addition, discuss how these intervals will change when NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" is used.
2. Consistent with NRC Information Notice 2004-09, "Corrosion of Steel Containment and Containment Liner," discuss any operating experience and evaluation results, regarding the potential for, or presence of, corrosive conditions at the junction of the metal liner and interior concrete floor of the containment, including the potential for stagnant water to have collected behind a degraded floor seal area that could promote pitting corrosion.

Enclosure

Risk Assessment

1. According to Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," the U.S. Nuclear Regulatory Commission (NRC) staff expects licensees to fully address all scope elements with Revision 2 of Regulatory Guide (RG) 1.200 by the end of its implementation period (i.e., one year after the issuance of Revision 2 of RG 1.200). Revision 2 of RG 1.200 endorses, with exceptions and clarifications, the combined American Society of Mechanical Engineers (ASME)/American Nuclear Society (ANS) probabilistic risk assessment (PRA) standard (ASME/ANS RA-Sa-2009).

Given that the implementation date of RG 1.200, Revision 2, was April 2010 and the date of the license amendment request (LAR) submittal, April 2013, describe any gaps between the 2007 focused scope peer review of the PRA model used in this application and RG 1.200, Revision 2, that are relevant to this submittal and the impact on this application.

2. Revision 2 of RG 1.200 endorses, with exceptions and clarifications, ASME/ANS RA-Sa-2009. The ASME/ANS PRA standard provides that PRA upgrades be followed by a focused scope peer review.

Discuss whether the inclusion of the recently developed simplified Level 2 PRA for the internal events model that was referenced in Section 4.5.2 of Attachment I to the LAR is a PRA maintenance or PRA upgrade as defined in the ASME/ANS PRA standard. If the inclusion of the simplified Level 2 PRA for the internal events model is a PRA upgrade, describe the focused scope peer review that was conducted and provide the resolution of the Facts and Observations (F&Os). Otherwise, explain why the inclusion of the simplified Level 2 PRA model is not considered an "incorporation into a PRA model of a new methodology."

3. Revision 2 of RG 1.200 endorses, with exceptions and clarifications, ASME/ANS RA-Sa-2009. In Regulatory Position 4.2 of RG 1.200, Revision 2, the NRC staff stated that it expects licensees to submit a discussion of the resolution of the peer review findings that are applicable to the parts of the PRA required for the application.

Provide a list of the F&Os from the focused scope peer review relevant to this submittal and explain how the F&Os were addressed for this application.

August 6, 2013

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Sincerely

/RA/

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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