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December 5, 2013
RC-13-0180

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
DATE CORRECTION TO LICENSE AMENDMENT REQUEST
LAR 12-06014 CHANGES TO SNUBBER SURVEILLANCE
REQUIREMENTS

Reference: 1. Letter from T. D. Gatlin (VCSNS) to Document Control Desk (NRC),
"License Amendment Request - LAR 12-06014 Changes to Snubber
Surveillance Requirements," dated April 2, 2013 (RC-13-0048)
[ML13095A107]

2. Letter from T. D. Gatlin (VCSNS) to Document Control Desk (NRC),
"Revision to License Amendment Request - LAR 12-06014 Changes
to Snubber Surveillance Requirements," dated October 3, 2013
(RC-13-0151)

South Carolina Electric & Gas Company (SCE&G), acting for itself and as an agent for South Carolina Public Service Authority, is submitting a correction to the Attachments that were enclosed in Reference two Revision to License Amendment Request (LAR) to the Technical Specifications (TS) for Virgil C. Summer Nuclear Station Unit 1 (VCSNS) dated October 3, 2013.

With this revision, VCSNS is providing the correct end date (December 31, 2023) for the fourth ISI interval. The impacted pages are contained within the attachments.

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This letter contains no commitments. If you should have any questions, please contact Mr. Bruce L. Thompson at (803) 931-5042.

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

12/4/13
Executed On


Thomas D. Gatlin

WLT/TDG/bd
Enclosure:

Description of Corrections to LAR 12-06014

- Attachment 1 – Description and Assessment (Page 1 of 7)
- Attachment 1 – Description and Assessment (Page 3 of 7)
- Attachment 5 – Proposed Snubber Plan (Page 4 of 6)

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

Enclosure 1

Description of Corrections to LAR 12-06014

VCSNS Unit 1 is providing corrections to items from LAR 12-06014, Changes to Snubber Surveillance Requirements. VCSNS Unit 1 has defined the fourth 10-year Inservice Inspection (ISI) as beginning January 1, 2014 and ending December 31, 2023.

Revised pages are provided to correct the fourth ISI interval end date. These pages supersede the corresponding previously submitted pages in Attachments 1 and 5 from the referenced letter (RC-13-0151). The revisions are denoted as Revision 2 to LAR 12-06014. The affected pages are shown in the table below:

SCE&G - Corrections to LAR 12-06014		
Revision Number	Location in Original Submittal of LAR 12-06014	Description of Change
2	Attachment 1, Page 1	Corrected interval end date
2	Attachment 1, Page 3	Corrected interval end date
2	Attachment 5, Page 4	Corrected interval end date

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

ATTACHMENT 1

Description and Assessment “revised”

1.0 SUMMARY DESCRIPTION

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas (SCE&G) is submitting a license amendment request to revise Technical Specification (TS) 3/4.7.7, "Snubbers," for Virgil C. Summer Nuclear Station (VCSNS). The proposed change would revise the TS surveillance requirements for snubbers to conform to the revised VCSNS Snubber Testing Program.

2.0 DETAILED DESCRIPTION

VCSNS is currently nearing the completion of the third 10-year Inservice Inspection (ISI) interval. The fourth 10-year ISI interval at VCSNS begins on January 1, 2014 and ends December 31, 2023. Currently, snubber testing and examination are performed in accordance with the specific requirements of TS 3/4.7.7 as authorized in NRC correspondence under TAC No. MC4323 (Accession No. ML051290198) dated May 10, 2005. As required by 10 CFR 50.55a(b)(3)(v)(B), SCE&G intends to adopt Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda. The proposed changes to the VCSNS TS are summarized below:

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- Reference to Specification 4.7.7.g in TS ACTION 3.7.7 would be replaced with reference to Specification 4.7.7.
- TS Surveillance Requirement (SR) 4.7.7 would be revised to remove specific surveillance requirements for demonstrating snubber operability. The current requirements would be replaced by a reference to the "Snubber Testing Program."

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements

VCSNS is currently nearing the completion of the third 10-year ISI interval. The fourth 10-year ISI interval at VCSNS begins on January 1, 2014 and ends December 31, 2023. Currently, snubber testing and examination are performed in accordance with the specific requirements of TS 3/4.7.7. Relief was authorized pursuant to 50.55a(a)(3)(i), for the third 10-year inservice inspection interval at VCSNS under TAC No. MC4323 (Accession No. ML051290198) dated May 10, 2005.

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10 CFR 50.55a(g)(4)(ii) requires that inservice examination of components conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b)(3), 12 months before the start of the 120-month inspection interval. If a revised ISI program for a facility conflicts with the TS for the facility, 10 CFR 50.55a(g)(5)(ii) requires licensees to apply to the Commission for amendment of the TS.

For the VCSNS fourth 10-year ISI interval beginning January 1, 2014 and ending December 31, 2023, as required by 10 CFR 50.55a(b)(3)(v)(B), SCE&G intends to adopt Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda, in place of the specific requirements of TS 3/4.7.7 as previously authorized in NRC relief correspondence dated May 10, 2005.

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The purpose of this amendment request is to remove the specific surveillance requirements for demonstrating snubber operability from the TS since the ISI program will be revised to include the requirements of the OM Code Subsection ISTD in the Snubber Testing Program. As such, the proposed changes to TS 3/4.7.7 are necessary to conform the TS to the revised ISI program.

4.2 Precedence

The changes proposed to TS 3/4.7.7 are similar to changes submitted by Public Service Electric and Gas (PSEG) Nuclear, LLC for Salem Generating Station, Units 1 and 2 and Dominion Nuclear Connecticut (DNC), Inc for Millstone Power Station Unit 2. The applicable references for these similar changes are provided below:

4.2.1 PSEG Letter LR-N10-0363, License Amendment Request: Changes to Snubber Surveillance Requirements [for Salem Units 1/2], dated October 4, 2010 (Accession No. ML102780066).

4.2.2 PSEG Letter LR-N11-0107, Response to Draft Request for Additional Information - License Amendment Request: Changes to

*South Carolina Electric & Gas
Virgil C. Summer Nuclear Station Unit 1*

2.0 EXAMINATION, TESTING AND SERVICE LIFE MONITORING REQUIREMENTS:

- 2.1 Visual Examinations, Functional Testing, and Service Life requirements shall be performed to the extent specified within SAP-0161 and referenced Surveillance Test Procedures (STP).
- 2.2 Snubbers are grouped into Defined Test Plan Groups (DTPGs) by design type, size, and accessibility in accordance with ISTD-5252. Each DTPG will be tested using the 10% sample plan per ISTD-5300. There are no snubbers attached to the Steam Generators. All mechanical snubbers at Virgil C. Summer Station Unit 1 are grouped as separate DTPGs by size.

DTPGs
PSA 1/4
PSA 1/2
PSA 1
PSA 3
PSA 10
PSA 35
PSA 100

- 2.4 The service life of all snubbers shall be monitored and snubbers replaced, reconditioned or evaluated in accordance with SAP-0161 and ISTD-6200 to ensure that the service life is not exceeded between surveillance inspections. The replacement or reconditioning shall be documented and records retained in accordance with VCSNS procedures.

3.0 EXAMINATION and TESTING METHODS:

- 3.1 Visual examinations shall be performed by individuals qualified in accordance with VCSNS procedures. These examinations are conducted to ensure the mechanical and structural condition of the snubber support location and to observe conditions that could affect functional adequacy. Visual examinations and functional testing shall be performed to verify the requirements specified within SAP-0161 are met in accordance with Subsection ISTD.

4.0 EXAMINATION and TESTING FREQUENCY:

- 4.1 Visual Examinations and Functional Testing shall be performed at the frequency specified within SAP-0161 and ISTD-4250 and ISTD-5240. VCSNS currently performs accessible and inaccessible snubber visual examinations as one group with the frequency shown in Table ISTD 4252-1.
- 4.2 Code Case OMN-13, which allows the extension of the visual examination interval, will be implemented for snubber inspections during the fourth 10-year ISI interval which begins on January 1, 2014 and ends on December 31, 2023. Code Case OMN-13 is approved for use in Regulatory Guide 1.192 (June 2003). The Visual Examinations of Table ISTD 4252-1 may be extended in accordance

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