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

May 5, 2015

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 REGARDING SNUBBER PROGRAM ALTERNATIVE REQUEST (TAC NO. MF5775)

Dear Mr. Gatlin:

By letter dated February 19, 2015, the South Carolina Electric & Gas Company (SCE&G, the licensee) submitted an alternative request for Virgil C. Summer, Unit 1. SCE&G proposes to perform the visual examination of snubbers and associated attachment hardware per the Snubber Program that will be documented in a surveillance test procedure per the American Society of Mechanical Engineers (ASME) OM Code, Subsection ISTD.

The NRC staff has determined that additional information is needed to continue the review as discussed in the Enclosure. We request that SCE&G respond to these RAIs within 30 days of the date of this letter. Please note that the NRC staff's review is continuing and further requests for information may be developed.

Sincerely,

Shawn Williams

Shawn Williams, 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

ALTERNATIVE REQUEST

REGARDING THE SNUBBER PROGRAM

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-395

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the South Carolina Electric & Gas Company (SCE&G) alternative request dated February 19, 2015 (Agencywide Documents Access and Management System Accession No. ML15055A588), for the Virgil C. Summer Nuclear Station, Unit 1. The NRC staff has determined that the following request for additional information (RAI) is required to complete its review.

RAI No. 1

In submitted relief request, two different ASME Codes are being used (a) ASME OM Code for snubbers (pin-to-pin), and (b) ASME Boiler & Vessel Code, Section XI for snubber associated attachment hardware (pin-to-pipe and pin-to-structure) excluding integral attachments. The submittal states ASME Section XI is 2007 Edition with 2008 Addenda. Please verify that ASME OM Code 2004 Edition will be used.

RAI No. 2

In Relief Request RR-4-08, Section 4, "Reason for Request," it states that "VCSNS Unit 1 is required to perform VT-3 visual examination on Class 1, 2, and 3 supports, including attachment hardware, per ASME Section XI. VCSNS is also required to perform visual examinations and testing on snubber assemblies in accordance with ASME OM Code, Subsection ISTD. When incorporating the criteria of Subsection ISTD into the Snubber Program, VCSNS Unit 1 will update Surveillance Test Procedure STP-803.002, Mechanical Snubber Visual Examination to include the visual examination of snubber attachment hardware (pin-to-pipe and pin-to-structure) along with the visual examination of the snubber assembly (pin-to-pin). With the proposed procedure update, the visual examination criteria of snubber program will meet the requirements established by ASME Section XI.

(1) Please verify and confirm that the proposed visual examination criteria of the Snubber Program will be identical to the VT-3 visual examination per IWA-2213 (IWA-2213(a) thru IWA-2213(g)) of ASME Section XI, Edition 2007 with 2008 Addenda.

(2) The relief request did not mention details about hydraulic snubbers and the proposed update of the procedure is related to mechanical snubbers. Please verify that hydraulic snubbers are not installed at VCSNS or VCSNS hydraulic snubbers procedures will be revised to add the VT-3 requirements.

RAI No. 3

In a VCSNS, Unit 1, Technical Specification amendment request submittal dated October 3, 2013 (ADAMS Accession No. ML13281A190), Attachment 5, "Snubber Examination, Testing, and Service Life Monitoring (SLM) Program Plan."

(a) Section 1.3 states, in part, that inspection, testing and SLM of snubbers shall be implemented and performed in accordance with the requirements of SAP-101, "Station Administrative Snubber Program Document". Please verify and confirm that VT-3 will be implemented in STP-101 along with Procedure STP-803.002.

(b) Section 4.2, states that VCSNS will be implementing Code Case OMN-13 to extend visual examination of snubbers (pin-to-pin) frequency at least once every 10 years. Please provide the frequency of visual examination of snubbers associated attachment hardware (pin-to-pipe and pin-to-structure) during this extended 10 year interval.

RAI No. 4

While using OMN-13 for snubbers during the extended interval of 10 years, if the number of unacceptable snubbers (pin-to-pin) exceeds the ISTD-4252-1 limits (these unacceptable snubbers can be found during non-inspection activities such as walkdowns or any other events i.e. water hammer, etc.), what action will be taken and how will these findings align with the supports and attachments inspection.

RAI No. 5

IWF-2430(a) states, in part, that component supports examinations performed in accordance with Table IWF-2500-1 that reveal flaws or relevant conditions exceeding the acceptance standards of IWF-3400, and that require corrective measures, shall be extended, during the current outage, to include the component supports immediately adjacent to flawed supports. Please explain how this situation (to include supports adjacent to flawed supports) will be considered, while using the proposed relief request to perform the visual examination of snubbers (pin-to-pin) and associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments). (Note: The adjacent flawed supports could be with or without a snubber).

RAI No. 6

NRC staff believes that the contents of referenced precedence documents listed in the Section 7, "Precedents," are different than the submitted relief request of RR-4-08. Please verify and revise as appropriate.

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/RA/

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