



April R. Rice
Manager
New Nuclear Licensing

May 11, 2015
NND-15-0278
10 CFR 50.55a

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

Subject: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Docket Numbers 52-027 and 52-028
Request for Alternative: ASME NPT Code Symbol Stamps

Reference: 1. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4, Request for Alternative: ASME NPT Code Symbol Stamps (VEGP 3&40PSI/ISI-ALT-03), dated April 27, 2015 (ND-15-0773)

Pursuant to 10 CFR 50.55a(z)(1), South Carolina Electric & Gas Company (SCE&G) hereby requests NRC authorization to use an alternative to the requirements of Subsection NCA, Table NCA-8100-1, "Certificates and Code Symbol Stamps Issued by the Society for Construction of Nuclear Power Plants" for the 1998 Edition with the 2000 Addenda of Section III of the ASME Boiler and Pressure Vessel (B&PV) Code through all subsequent Editions and Addenda of Section III of the B&PV Code authorized for use in 10 CFR 50.55a(1)(i) with regard to ASME NPT Code Symbol Stamps. The proposed request for alternative is applicable for construction, pre-service inspection, and all ASME NPT Code Symbol Stamp activities until the 2011 Addenda to the 2010 Edition of ASME B&PV Code, Section III has been authorized for use by reference in 10 CFR 50.55a(1)(i).

The details of the 10 CFR 50.55a request are contained in the enclosure. Approval is requested by October 30, 2015, to ensure that SCE&G will continue to comply with the Code of Federal Regulations and the ASME B&PV Code with regard to ASME NPT Code Symbol Stamps.

This request is consistent in technical content with Southern Nuclear Operating Company (SNC) alternative request VEGP 3&40PSI/ISI-ALT-03 submitted April 27, 2015 (Reference 1).

This letter contains no regulatory commitments.

Should you have any questions regarding this letter, please contact Justin Bouknight, Licensing Supervisor, by telephone at (803) 941-9828, or by email at justin.bouknight@scana.com

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

Executed on this 11th day of May 2015.

Sincerely,



April R. Rice
Manager
New Nuclear Licensing

BB/ARR/bb

Enclosure: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 – Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1) Regarding ASME NPT Code Symbol Stamps

c:

Victor McCree – Region II Regional Administrator
Denise McGovern – COL PM
Marion Cherry – Santee Cooper
Stephen A. Byrne – SCE&G
Jeffrey B. Archie – SCE&G
Ronald A. Jones – SCE&G
April Rice – SCE&G
Justin Bouknight – SCE&G
Bryan Barwick – SCE&G
Richard Troficanto – SCE&G
Alvis J. Bynum – SCE&G
Richard J. Easterling – Westinghouse
Joel Hjelseth – Westinghouse
Brian McIntyre – Westinghouse
Michael Frankle – Westinghouse
Brian Bedford – Westinghouse
Joseph Cole – Westinghouse
Patrick Young – Westinghouse
Ken Hollenbach – CB&I Stone & Webster
Curtis Castell – CB&I Stone & Webster
Chuck Baucom – CB&I Stone & Webster
AJ Marciano – CB&I Stone & Webster
Sean Burk – CB&I Stone & Webster
Benny Buras – CB&I Stone & Webster
Charlie White – CB&I Stone & Webster
Kathryn M. Sutton – Morgan Lewis
Jim Reece – Unit 1 NRC Resident Inspector
Patrick Donnelly – Unit 2/3 NRC Resident Inspector
VCSummer2&3ProjectMail@cbi.com
vcsummer2&3project@westinghouse.com
DCRM-EDMS@SCANA.COM
VCSNNDCorrespondence@scana.com

South Carolina Electric & Gas

NND-15-0278

Enclosure

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3

Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1)





Regarding

ASME NPT Code Symbol Stamps

Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(1)

Plant Site-Unit:	Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Interval Dates:	Applies to VCSNS 2&3 construction, pre-service inspection (PSI), and all American Society of Mechanical Engineers' (ASME) NPT Code Symbol Stamp activities until the 2011 Addenda to the 2010 Edition of ASME Boiler and Pressure Vessel (B&PV) Code, Section III has been authorized for use by reference in 10 CFR 50.55a(1)(i).
Requested Date for Approval:	Approval is requested by October 30, 2015 to ensure that South Carolina Electric & Gas Company (SCE&G) will continue to comply with the Code of Federal Regulations (CFR) and the ASME B&PV Code Section III with regard to NPT Code Symbol Stamp activity.
ASME Code Components Affected:	ASME Section III, Division 1, Class 1, 2, and 3 parts, appurtenances, piping subassemblies, and tubular products welded with filler metal (NPT).
Applicable Code Edition and Addenda:	1998 Edition with the 2000 Addenda of Section III of the ASME B&PV Code through all subsequent Editions and Addenda of Section III of the B&PV Code authorized for use in 10 CFR 50.55a(1)(i).
Applicable Code Requirements:	ASME B&PV Code, Section III, Table NCA-8100-1, "Certificates and Code Symbol Stamps Issued by the Society for Construction of Nuclear Power Plants."
Reason for Request:	<p>The ASME has issued certain ASME NPT Code Symbol Stamps with a horizontal "NPT" that could be considered non-compliant with the illustration shown in the ASME B&PV Code, Section III, Division 1, Subsection NCA, Table NCA-8100-1, 2010 edition and earlier editions/addenda.</p> <p>On February 9, 2015, ASME approved Code Case N-852, "Application of the ASME NPT Stamp Section III, Divisions 1, 2, 3, and 5" allowing the ASME NPT Code Symbol Stamp with the NPT Letters arranged horizontally to be used for construction to the 2010 Edition and earlier Editions and Addenda of Section III. The Code Case also added a clarification that it is the opinion of the Committee that the NPT Code Symbol Stamp with the NPT letters arranged horizontally is equivalent to the NPT Code Symbol Stamp as depicted and required by NCA-8000. However, until Code Case N-852 is endorsed for use by the NRC in 10 CFR 50.55a, this alternative to the requirements of NCA-8000 is needed to ensure that SCE&G will continue to comply with the CFR and the ASME B&PV Code with regard to ASME NPT Code Symbol Stamps.</p>

Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(1)

<p>Proposed Alternative:</p>	<p>Allow the ASME Section III Code to use ASME Section III NPT Code Symbol Stamps with the horizontal "NPT" designator interchangeably with the currently authorized ASME Section III NPT Code Symbol Stamps.</p>
<p>Basis for Use:</p>	<p>The following ASME Section III, Division 1 Code "NPT"-type Symbol Stamp is required by Code Editions and Addenda prior to 2011 Addenda to the 2010 Edition:</p> <div style="text-align: center;">  </div> <p>The ASME has issued some ASME NPT Stamps with a horizontal "NPT" as shown below:</p> <div style="text-align: center;">  </div> <p>These stamps with the horizontal "NPT" designation could be considered non-compliant with the illustration shown in the ASME B&PV Code, Section III, Division 1, Subsection NCA, Table NCA-8100-1, 2010 edition and earlier editions/addenda.</p> <p>In an ASME letter to the NRC dated August 27, 2014, the ASME informed the NRC that the ASME has reviewed the issue regarding these NPT stamps' non-compliance with the illustration shown in the ASME Code and it is the position of ASME that:</p> <div style="text-align: center;">  is equivalent to  </div> <p>Although these NPT Stamps differ slightly in appearance, they serve the same purpose of certifying code compliance by the ASME Certificate Holder with confirmation by the Authorized Nuclear Inspector and provide for the same level of quality assurance.</p> <p>There are no changes to any technical or quality requirements in the Code and this request does not impact any plant-specific DCD Tier 1 information, nor any ITAAC.</p> <p>Because this proposal is equal in both quality and safety, authorization is requested in accordance with 10 CFR 50.55a(z)(1) to use ASME Section III NPT Code Symbol Stamps with the horizontal "NPT" designator interchangeably with the currently authorized ASME NPT Code Stamp.</p>

Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(1)

Duration of Proposed Alternative:	From date of issuance of authorization per this request until the 2011 Addenda to the 2010 Edition of ASME B&PV Section III Code has been authorized for use by reference in 10 CFR 50.55a(b)(1).
Precedents:	None identified.
References:	<ol style="list-style-type: none">1) 1998 Edition with the 2000 Addenda to the ASME B&PV Code, Section III2) 2010 Edition with the 2011 Addenda to the ASME B&PV Code, Section III3) ASME Code Case N-852, "Application of the ASME NPT Stamp Section III, Divisions 1, 2, 3, and 5," approved February 9, 20154) ASME letter to NRC, "ASME NPT Stamp Equivalency" dated August 27, 2014
Status:	Awaiting NRC authorization