



June 2, 2016
RC-16-0091

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

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
RELIEF REQUEST RR-III-12 PROPOSED ALTERNATIVE INSPECTION
REQUIREMENTS FOR PIPING WELDS – RESPONSE TO REQUEST
FOR ADDITIONAL INFORMATION

- References:
1. SCE&G Letter from T. D. Gatlin to NRC Document Control Desk, "Relief Request RR-III-12 Proposed Alternative Inspection Requirements for Piping Welds," dated November 10, 2015 (ML15316A556)
 2. NRC Letter to G. A. Lippard (SCE&G), "Virgil C. Summer Nuclear Station, Unit No. 1 – Request for Additional Information (CAC No. MF7098)," dated April 8, 2016 (ML16097A081)
 3. SCE&G Letter from G. A. Lippard to NRC Document Control Desk, "Relief Request RR-III-12 Proposed Alternative Inspection Requirements for Piping Welds – Response to Request for Additional Information," dated May 6, 2016 (ML16132A248)

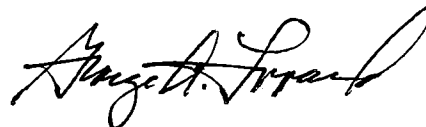
South Carolina Electric & Gas Company (SCE&G), acting for itself and as an agent for South Carolina Public Service Authority pursuant to 10CFR50.55a(g)(5)(iii), requested relief from the volumetric requirement of ASME Code Section XI per Reference 1. NRC review of this relief request determined that additional information was required and a request for additional information (RAI) was issued by Reference 2. SCE&G responded to the RAI with Reference 3. An error was identified in the response to RAI response 1 within Reference 3. The attachment replaces RAI response 1 in its entirety.

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This letter contains no commitments. If you have any questions or require additional information, please contact Bruce Thompson at (803) 931-5042.

Very truly yours,



George A. Lippard

NRA/GAL/rp

Attachments:

- I. VCSNS Response to Request for Additional Information

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

Attachment I

VCSNS Response to Request for Additional Information

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the South Carolina Electric & Gas Company (SCE&G) alternative request dated November 10, 2015 (Agencywide Documents Access and Management System Accession No. ML15316A556), 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:

Please discuss the ASME Code Section XI, Appendix I requirement from which procedure SCANA-UT-98-2 is based. If supplements apply, please discuss which supplements were used.

VCSNS Response:

ASME Section XI, Appendix I

SCANA-UT-98-2, Revision 3 was utilized for Manual Ultrasonic Examination of Austenitic Piping Welds, and is therefore under the requirements 1998-2000 Section XI, Appendix I Article I-2220 that states the following:

Ultrasonic examination procedures, equipment, and personnel used to detect and size flaws in piping welds shall be qualified by performance demonstration in accordance with Appendix VIII and no other I-2000 requirements apply.

From Procedure SCANA-UT-98-2, Revision 3, Section 1.0 Scope:

- 1.1 *This procedure describes the manual ultrasonic examination requirements for wrought austenitic full penetration piping welds and the adjacent base materials including ultrasonic examination for intergranular stress corrosion cracking (IGSCC) in these materials.*

- 1.2 *This procedure details an ASME Section XI, IWA-2240 examination; PDI-UT-2, Rev C, Addenda 1, 2 & 3 has been demonstrated in accordance with the requirements of ASME Section XI, Appendix VIII, 1995 Edition with addenda through 1996, as modified in the Performance Demonstration Initiative (PDI) program description. This demonstration was also conducted in accordance with the requirements of the Federal Register, Part II, Nuclear Regulatory Commission, 10CFR Part 50, Industry Codes and Standards, Amended Requirements, final Rule, Dated 22 September, 1999.*
- 1.3 *The scope requirements of PDI-UT-2, Revision C Addenda 1, 2 & 3, shall apply to this procedure.*
- 1.4 *This procedure has been written to adopt performance demonstration initiative procedure (PDI) PDI-UT-2, Revision C Addenda 1, 2 & 3, PDI Generic Procedure for Ultrasonic Examination of Austenitic Pipe Welds.*

From Procedure SCANA-UT-98-2, Revision 3, Section 2.0 Applicable Documents, Codes and Standards:

- 2.1.1 *ASME Boiler and Pressure Vessel Section XI, 1998 Edition, through 2000 Addenda.*
- 2.1.2 *ASME Boiler and Pressure Vessel Section XI, Appendix VIII, 1998 Edition, through 2000 Addenda.*

From Procedure SCANA-UT-98-2, Revision 3, Section 4.0 Procedural Qualification:

- 4.1 *PDI-UT-2 Rev C Addenda 1, 2 & 3, has been demonstrated to meet the 10CFR50.55a Appendix VIII alternate requirements to ASME Section XI, Appendix VIII, 1998 Edition including 2000 Addenda.*
- 4.2 *PDI Procedures meet the requirements of 10 CFR Part 50.55a, United States Nuclear Regulatory Commission, Industry Codes and Standards, Amended Requirements, Final Rule (RIN3150-AE26). Further qualification of this procedure is not required.*

Supplements Used:

ASME Boiler and Pressure Vessel Section XI, Appendix VIII, Supplement 2 - Qualification Requirements for Wrought Austenitic Piping Welds, 1998 Edition through 2000 Addenda