

NRR-DMPSPeM Resource

From: Williams, Shawn
Sent: Thursday, October 25, 2018 2:59 PM
To: MOORE, MICHAEL S
Cc: DALICK, SARA BETH
Subject: Virgil C. Summer, Unit 1 – Acceptance of Relief Request (RR-4-14), Use of a Performance Based Testing Frequency for Pressure Isolation Valves (EPID No. L-2018-LLR-0129)

Dear Mr. Moore,

By letter dated October 8, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18282A046), the South Carolina Electric & Gas Company submitted an alternative request for Virgil C. Summer Nuclear Plant, Unit 1. The proposed alternative requests the use of a performance based testing frequency for pressure isolation valves as an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code Subsection ISTC-3630 paragraph (a). The alternative request was submitted pursuant to Section 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR), which requires the applicant to demonstrate that the proposed alternative would provide an acceptable level of quality and safety.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 105 hours to complete. The NRC staff expects to complete this review by October 2019, as requested in your application. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-1009.

Shawn Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

Docket No. 50-395

Hearing Identifier: NRR_DMPS
Email Number: 643

Mail Envelope Properties (BL0PR0901MB3154B2C706A495F894699A7190F70)

Subject: Virgil C. Summer, Unit 1 – Acceptance of Relief Request (RR-4-14), Use of a Performance Based Testing Frequency for Pressure Isolation Valves (EPID No. L-2018-LLR-0129)
Sent Date: 10/25/2018 2:58:41 PM
Received Date: 10/25/2018 2:58:45 PM
From: Williams, Shawn

Created By: Shawn.Williams@nrc.gov

Recipients:
"DALICK, SARA BETH" <SARA.DALICK@scana.com>
Tracking Status: None
"MOORE, MICHAEL S" <MICHAEL.S.MOORE@scana.com>
Tracking Status: None

Post Office: BL0PR0901MB3154.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3396	10/25/2018 2:58:45 PM

Options
Priority: Standard
Return Notification: No
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Sensitivity: Normal
Expiration Date:
Recipients Received: