



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

April 12, 2019

LICENSEE: South Carolina Electric & Gas, Inc. (SCE&G)
FACILITY: Virgil C. Summer, Unit 1
SUBJECT: VIRGIL C. SUMMER, UNIT 1 - APRIL 4, 2019, MEETING SUMMARY
REGARDING PRE-APPLICATION MEETING TO DISCUSS TWO PROPOSED
RELIEF REQUESTS (EPID L-2018-LRM-0018)

On April 4, 2019, a Category 1 public teleconference call was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of South Carolina Electric & Gas Company (SCE&G). This was a pre-application call to discuss:

- (1) A proposed relief request to include two check valves to the NRC-approved relief request dated December 17, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18345A060) for performance-based testing frequency for pressure isolation valves (PIVs).
- (2) A proposed relief request requesting relief from certain check valve condition monitoring requirements that would prevent the station from immediately extending the PIV and check valve testing frequency to every third outage.

The public meeting notice and agenda, dated March 19, 2019 (ADAMS Accession No. ML19078A080), are available in the NRC Public Meeting website. A list of participants is provided in Enclosure 1. Prior to the meeting, SCE&G provided a draft relief request application (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19091A058).

Public Conference Call

During the meeting, SCE&G gave an overview of the two proposed relief requests as provided in the draft application. SCE&G stated the intent was to submit the two relief requests within approximately one month.

One proposed relief request is to apply Title 10 of the *Code of Federal Regulations* (10 CFR) Appendix J, Option B performance-based leakage test frequency, to two residual heat removal header bypass check valves that are tested in parallel with two of the PIVs that were changed to a performance-based frequency in the December 17, 2018, NRC-approved relief request. The licensee stated that proposed relief will align the check valve testing with their corresponding PIVs. NRC staff understood the request and did not identify any concerns or provide any specific comments regarding this proposed relief request.

In the second proposed relief request, the licensee is proposing an alternative to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), Mandatory Appendix II, 4000(b), "Optimization of Condition-Monitoring Activities," (1)(e), which states, in part, "Identify the interval of each activity. Interval extensions shall be limited to one fuel cycle per extension." The licensee is requesting to immediately extend the leakage tests of the 35 check valves listed in Table 1 to every third refueling outage. The justification provided in the draft application is that there are four consecutive successful leakage tests on each check valve in Table 1.

The NRC staff noted that the data presented in the draft application suggests that there may have been work completed on some valves during the last four outages and if so, then two successful leak tests must be performed before extending the interval to every third refueling outage for those specific valves that had work done. In response to NRC staff's comment, the licensee stated they would review the maintenance history of the valves and include, as appropriate, an explanation of any data anomalies that indicate work was performed.

The NRC staff commented that the two relief requests should be submitted in two stand-alone relief requests, not one combined relief request as in the draft application. The NRC staff noted the second relief request should include the same statements as the first relief request, i.e., that the valves must demonstrate good performance for two consecutive cycles before extending to every third refuel outage not to exceed 60 months, and the valves that fail the leak test, must return to the 2 year interval and repeat the demonstration of good performance before returning to the every third interval not to exceed 60 months.

No regulatory decisions or commitments were made during the meeting. There were no members of the public on the call. The issuance of this document closes
EPID L-2018-LRM-0018.



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Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-395

Enclosure:
List of Attendees

cc: Listserv

LIST OF PARTICIPANTS

APRIL 4, 2019, PRE-APPLICATION PUBLIC CONFERENCE CALL

WITH

SOUTH CAROLINA ELECTRIC & GAS

REGARDING TWO PROPOSED RELIEF REQUESTS

Nuclear Regulatory Commission Staff

Shawn Williams

Michael Farnan

Licensee Participants

Michael Moore, SCE&G

Sara Beth Dalick, SCE&G

Bruce Bennett, SCE&G

William Wood, SCE&G

Justin Bouknight, SCE&G

Gil Williams, SCE&G

Shayan Sinha, Dominion

Jeffrey Stumb, Dominion

Enclosure

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RELIEF REQUESTS (EPID L-2018-LRM-0018) DATED APRIL 12, 2019

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