

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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T. C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

April 30, 1982



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Inservice Test Program

Dear Mr. Denton:

In response to the NRC Summary (dated 3/16/82) of the February 24-25, 1982, meeting regarding the Inservice Test Programs for valves, South Carolina Electric and Gas Company, acting for itself and as agent for the South Carolina Public Service Authority, hereby submits ten (10) copies of Revision 3 to GTP-002 along with appropriate relief requests. The following explanations are offered in response to your statements 1, 2, 3 and 4 in the Meeting Summary.

- 1) Passive containment isolation valves have been included in the valve ISI Program and categorized A or A/C, as applicable. These valves will be tested as specified in the program.
- 2) Valves 8703A and 8703B have been included in the valve ISI Program and categorized A/C passive. These valves will be tested as specified in the program.
- 3) Valves 8701A, 8701B, 8702A and 8702B have been included in the valve ISI Program and categorized A passive. These valves will be tested as specified in the program.
- 4) The Code permits representative sampling for relief valve operability testing during each five (5) year period of time. Therefore, a representative sampling for check valve operability testing by disassembly inspection during refueling shutdown would be adequate to demonstrate the functional effectiveness of check valves 3009A, 3009B, 8948A, 8948B, 8948C, 8956A, 8956B, 8956C.

It is not known at this time what the man-rem exposure is at these valve locations. However, a definite increase in the collective exposure would be experienced during disassembly/reassembly and, therefore, circumventing the philosophy of the ALARA Program.

In addition, repeated disassembly and reassembly could in fact promote failure of the referenced check valves.

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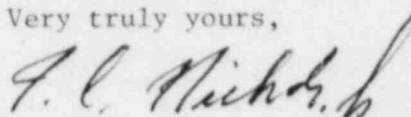
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Mr. H.R. Denton
Inservice Test Program

GTP-002, Revision 1 should be removed from the Inservice Inspection Program and replaced with GTP-002, Revision 3. Please insert relief requests in the program behind GTP-002.

Should there be any questions, please let us know.

Very truly yours,



T.C. Nichols, Jr.

LBC/ARK/bsg
Attachment

cc: V.C. Summer (w/o A.)
T.C. Nichols, Jr. (w/o A.)
G.H. Fischer (w/o A.)
H.N. Cyrus
H.T. Babb
D.A. Nauman
M.B. Whitaker, Jr. (w/o A.)
W.A. Williams, Jr.
J.P. O'Reilly
O.S. Bradham
R.B. Clary
M.N. Browne
A.R. Koon
G.J. Braddick
J.L. Skolds
J.B. Knotts, Jr.
C.L. Ligon (NSRC)
B.A. Bursey
J.C. Ruoff
NPCF
File

INSTRUCTION SHEET
FOR REVISION
TO THE
INSERVICE INSPECTION PROGRAM

REMOVE

Section III (GTP-002, Rev. 1)

INSERT

Section III (GTP-002, Rev. 3) and
GTP-002 Relief Request