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Docket No.: 50-395

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Dear Mr. Dixon:

Subject: Monitoring Program For Service Water Pond Structures - Virgil C  
Summer Nuclear Station

We have reviewed your letter to H. R. Denton dated June 14, 1982, which provided comments and proposals for monitoring service water pond structures. The staff positions on your responses are as follows:

- (1) The staff concurs with the inspection program for north and south dams and agrees that future scheduled inspections are appropriate, as described in comment 1 of your June 14, 1982 letter.
- (2) With respect to comment 2 of your June 14, 1982 letter, our concerns remain as stated in the Safety Evaluation Report. The inspection schedule for the service water pumphouse and intake structure and west embankment should consider the forthcoming 1982 inspections to be the "initial impoundment inspection". Annual inspections should follow as suggested in Regulatory Guide 1.127.
- (3) With regard to comment 3 of your June 14, 1982 letter, it is our understanding that underwater diver inspections of the tunnel can be performed when the plant is in operation, therefore, the diver inspections schedule should not be controlled by the schedule for refueling outages. Because of the safety significance of the intake structure and the past problem with this structure and its foundation, more frequent inspections than those proposed by you are required. The inspection schedule should provide a baseline diver inspection in 1982, with subsequent annual diver inspections for the next 4 years followed by inspections at five year intervals thereafter.

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Mr. O. W. Dixon, Jr.

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Regulatory Guide 1.127 addresses adequately designed and constructed facilities which show no apparent signs of distress. Because the Summer intake structure and west embankment do not meet this applicability test, more conservative inspection provisions are necessary and must be imposed, at least until performance has been documented. Therefore, less frequent inspections than those specified above will not be approved until future inspections and evaluations warrant such relaxation.

Sincerely,

Original signed by:

B. J. Youngblood

B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

cc: See next page

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