

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE BOX 764

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C. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

August 17, 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
Steam Generator Inspection Ports
Licensing Condition 2.C.13

Dear Mr. Denton:

In a letter to you dated June 8, 1981 South Carolina Electric and Gas Company (SCE&G) discussed our position regarding the installation of inspection ports in the steam generators at the Virgil C. Summer Nuclear Station. The requirement for installation of inspection ports was originally sent to SCE&G in a letter dated April 21, 1980 and later appeared in the Virgil C. Summer Nuclear Station Safety Evaluation Report (SER). Additionally, it has been included as licensing condition 2.C.13 in our operating license to be completed prior to start-up after first refueling.

The Staff required that the ports be located above the top of the tube support plate (TSP) looking down the tube lane at the row one "U" bend and indicated in the SER that the purpose of these inspection ports was to monitor tube and support plate degradation caused by denting.

It has long been our position, and that of Westinghouse, that installation of such ports to monitor denting is unnecessary. The denting phenomenon has historically first occurred on the hot leg side of the steam generator and progressed from the lower TSP of the generator to the top TSP. Denting is evidenced by restriction of the tube at TSP intersections and by flow slot hourglassing at each TSP. The progression of denting to the point where visual indications would be apparent through an inspection port above the top TSP would occur long after denting would be detectable by eddy current inspection and visually apparent through the existing lower inspection port.

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In light of these facts, we request that the Staff remove the requirement for installation of these inspection ports from the Virgil C. Summer operating license.

If you have any questions, please let us know.

Very truly yours,

H T Babb
for O. W. Dixon, Jr.

NEC:OWD/fjc

cc: V. C. Summer
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