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DOCKETED
USNRC

April 21, 1994
Refer to: RC-94-0107

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DOCKET NUMBER
PROPOSED RULE PR 50
(59FR979)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary of the Commission
U S Nuclear Regulatory Commission
Washington, DC 20555

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Attention: Docketing and Services Branch

Dear Mr. Chilk:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON PROPOSED RULE CHANGE TO 10CFR50.55a (59FR979)

South Carolina Electric & Gas Company (SCE&G) has reviewed the proposed rule change to 10CFR50.55a that would include containment requirements in inservice inspection programs (reference 59FR979). The subject rule has been proposed to supplement existing regulations which do not provide specific guidance on how to conduct containment examinations. The proposed rule would require licensees to adopt Subsections IWE and IWL of the ASME code.

SCE&G believes that existing regulations (e.g., General Design Criteria 16 and 53 and 10CFR50 Appendix J) and licensee commitments (e.g., Technical Specifications and FSAR commitments) are adequate to ensure containment integrity; therefore, additional rulemaking is not required. SCE&G endorses the comments provided by the Nuclear Energy Institute (NEI) and fully supports the NEI conclusion that the proposed rulemaking requires a cost/benefit analysis as specified in the Backfit Rule (10CFR50.109). The NRC has not demonstrated that a generic problem of excessive containment degradation exists nor that this degradation presents an actual safety concern.

The proposed rule makes no distinction between the different types of containment designs and environmental conditions. This would cause licensees to submit exemption requests, unnecessarily consuming licensee and NRC resources. In addition, the proposed rule will increase worker radiation exposure and impose significant implementation costs and therefore represents a regulatory burden with little, if any, safety benefit.

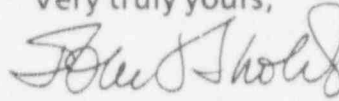
SCE&G recommends that NRC work with the NEI to evaluate the need for additional guidance for conducting containment examinations. This guidance should be focused on the containment design and environmental conditions which pose a true safety concern. The guidance should also allow implementation flexibility for licensees.

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If you have any questions on this issue, please contact April Rice at 803-345-4232.

Very truly yours,



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File (811.02 - 50.002G)
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