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June 16, 1994
Refer to: RC-94-0160

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
ASME SECTION III RELIEF REQUESTS (NRR 940003-1)

By letter dated June 10, 1994, you requested clarification of the TS requirements as indicated in the following paragraphs.

1. While the sample selection should ensure that the snubbers selected are representative of the various configurations, operating environments, range of size, and capacity of snubbers, such selection should be a random sample of all the applicable snubbers. Is this consistent with Summer Station procedures?
2. Snubbers placed in the same location as snubbers which failed the previous functional testing should be retested at the time of the next functional test, but should not be included in the sample plan. Is this consistent with Summer Station procedures?
3. Please provide details of how inspections for snubbers classified as "inaccessible" during normal power operation differ from inspections of snubbers classified as "accessible."

These items are addressed as agreed upon in the telephone conference call between VCSNS (David Haile, Jim Proper) and NRC (George Wunder, Arnold Lee) on June 10, 1994. Relief Request RR06 was revised to incorporate VCSNS's response to Items 1 and 2. No other changes were made to this request (see Attachment I).

With respect to Item 3, VCSNS has no exceptions or differences in how snubber examination or testing is conducted regarding snubbers classified as "inaccessible" during normal power operation or "accessible."

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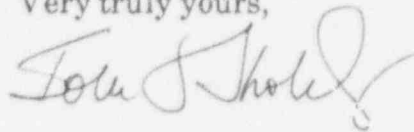


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Should you have any questions, please call Mr. David Haile at (803) 345-4322 or Mr. Michael J. Zaccone at (803) 345-4328.

Very truly yours,



John L. Skolds

MJZ/JLS/nkk
Attachment

c: O. W. Dixon
R. R. Mahan (w/o Attachment)
R. J. White
G. F. Wunder
General Managers
NRC Resident Inspector
J. B. Knotts Jr.
J. W. Flitter
NSRC
Central File System
RTS (NRR 940003-1)
File (810.19-2)

RR-06

SNUBBER RELIEF REQUEST
Rev. 1

COMPONENTS:

All Non-exempt snubbers required to be inspected and tested by the provisions of IWF-5300.

CODE REQUIREMENT:

Subarticle IWF-5300 of the 1989 edition of the ASME Boiler Pressure Vessel Code, Section XI requires that snubbers are to undergo inservice examination and testing per the 1988 Addenda to ASME/ANSI OM-1987, Part 4. These requirements provide the methodology and corrective actions for examining snubbers and for functional testing snubbers.

RELIEF REQUEST:

To exempt the applicable snubbers from the requirements of IWF-5300 and as an alternative, perform the required examination and testing of snubbers as prescribed by Technical Specifications.

ALTERNATE TEST:

Apply the visual examination and functional testing requirements that are prescribed by Technical Specifications (including sampling and frequency requirements) to the components identified above. In addition to meeting the requirements of the Technical Specifications, V.C. Summer Nuclear Station (VCSNS) will:

- 1) As far as practicable, select snubber functional test samples by first ensuring the snubbers will be selected from representative groups, as required by the Technical Specifications, and then by randomly selecting snubbers from those representative groups.
- 2) When a snubber fails its functional test due to its location, its replacement snubber will be tested at the time of the next required snubber functional test. This snubber will be included in addition to the minimum required sample.

BASIS FOR RELIEF:

VCSNS is required to incorporate the 1989 edition of the ASME Code as the governing requirement for the second ten-year inservice inspection interval. These requirements contain snubber examination and testing methodologies that are nearly identical to the methodologies prescribed in the Technical Specification for examination and testing of snubbers. Having two nearly redundant sets of snubber requirements presents unnecessary confusion in sample selection, data collection,

acceptance criteria, and corrective actions. These requirements will in some cases cause a duplication of test documentation. However, in other cases, additional confusion is created by the difference in snubber categories. Approximately half of the snubbers at VCSNS are required to be tested by both Technical Specifications and the ASME Code. The other half are only required to be tested by one of the requirements. Therefore, sampling becomes very confusing since some snubbers may be applicable to both requirements and others to only one. For the same reason acceptance criteria and corrective actions become difficult to apply.

One area where the requirements do not closely resemble each other is the inspection frequency changes in response to visual examination failures. The differences can cause different frequency requirements to be prescribed to a single group of snubbers as a result of the same inspection. This situation obviously would increase the possibility of applying the wrong action thus creating a nonconformance, an inoperability or even a violation of Technical Specifications. Also, the ASME has recently approved a revision to the snubber examination requirements that incorporates the Technical Specification Table for inspection frequency into Section XI. Therefore, the ASME is in agreement that these actions should not be in conflict.

In order to remove the confusion and impracticability of trying to administer such similar requirements to snubber categories that partially overlap and to remove the possibility of requiring contradicting actions to apply to the same snubber(s), VCSNS believes that meeting the requirements that are contained in the Technical Specifications for all the snubbers which apply to either category will provide sufficient testing of snubbers. Therefore, the proposed alternate test will provide an acceptable level of quality, and compliance with the Code would result in a hardship without a compensating increase in quality or safety.