

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

August 2, 1984

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

SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
ASME Section XI
Inservice Inspection of
Feedwater System

Dear Mr. Denton:

South Carolina Electric & Gas Company (SCE&G) submits the following changes to the Valve Inservice Inspection Program for the Virgil C. Summer Nuclear Station, Unit No. 1. These changes will be added to the next revision of the Inservice Inspection Program to be submitted at a later date. The change summary of the new revision will reference this letter when detailing changes to the valves identified below:

Valves IFV-478-FW, IFV-488-FW, IFV-498-FW, IFV-3321-FW, IFV-3331-FW, and IFV-3341-FW are added to the Inservice Inspection Program as Category B valves. The valves are Non ASME Code valves but are being added to the Inservice Inspection Program. These valves should be tested in addition to the Feedwater Isolation Valves to assure Feedwater Isolation in the event of a Feedwater Isolation Signal. A relief request to perform stroke testing of the valves during cold shutdown in lieu of quarterly is also attached.

As required by Title 10 of the Code of Federal Regulations, Part 170 (10 CFR 170), a check in the amount of one hundred fifty dollars (\$150.00) is enclosed. It is our understanding that in accordance with the revision to 10 CFR 170, SCE&G will be assessed in the future for the regulatory review required to process this relief request.

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Should you have any questions, please call us.

Yours very truly,



O. W. Dixon, Jr.

HCF:JWP:OWD/dwf
Attachments

cc: V. C. Summer
T. C. Nichols, Jr./O. W. Dixon, Jr.
E. H. Crews, Jr.
E. C. Roberts
W. A. Williams, Jr.
D. A. Nauman
J. P. O'Reilly
Group Managers
O. S. Bradham
C. A. Price
C. L. Ligon (NSRC)
K. E. Nodland
R. A. Stough
G. Percival
C. W. Hehl
J. B. Knotts, Jr.
NPCF
File

VALVE TEST RELIEF REQUESTS

D. SYSTEM: FEEDWATER SYSTEM (FW)

D.4 Valves: IFV-478-FW, IFV-488-FW, IFV-498-FW

Category: B

Class: Non ASME Code

Function: Controls feedwater flow from the main feedwater pumps to the associated steam generator.

Test Requirement: Exercise valves (full stroke) for operability every three (3) months.

Basis for Relief: Testing these valves during plant operation would isolate feedwater to the associated steam generator which would result in a reactor trip.

Alternate Test: Valves will be tested during cold shutdown.

VALVE TEST RELIEF REQUESTS

D. SYSTEM: FEEDWATER SYSTEM (FW)

D.5 Valves: IFV-3321-FW, IFV-3331-FW, IFV-3341-FW

Category: B

Class: Non ASME Code

Function: Controls feedwater flow to the steam generators at power levels less than 25%.

Test Requirement: Exercise valves (full stroke) for operability every three (3) months.

Basis for Relief: These valves are closed during power operation above 25%, and their required safeguards position is also closed. These valves are open and controlling feedwater flow during the period from plant startup to the 25% power level, and are then closed. Testing these valves during plant operation would cause a perturbation in the associated steam generator level which could result in a reactor trip.

Alternate Test: Valves will be tested during cold shutdown.