SOUTH CAROLINA ELECTRIC & GAS COMPANY

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O. W DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

August 17, 1984

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 Operating License No. NPF-12

Spent Fuel Pool Rerack Modification

Dear Mr. Denton:

On January 23, 1984, South Carolina Electric and Gas Company (SCE&G) filed a request with the Nuclear Regulatory Commission (NRC) seeking approval for proposed rerack modifications to the spent fuel pool at the Virgil C. Summer Nuclear Station. The purpose of this letter is to restate and clarify the Company's present fuel storage capabilities utilizing the new high density racks.

SCE&G's proposed modification includes the employment of storage racks designed to be capable of accommodating spent fuel with a higher initial enrichment and thus the potential for higher burnups expected to be common in the future. These capabilities were considered to be desireable qualities in spent fuel storage rack designs because they provide SCE&G the ability to achieve more economical fuel consumption in future operations of the plant while still having the ability to store spent fuel onsite.

The Company is aware that current industry standards accepted by the NRC limit fuel burnups to a region average discharge of 38,000 MWD/MTU for Westinghouse 17 x 17 fuel. It is not SCE&G's intent to operate outside of these bounds without further expressed written approval from the NRC. As stated in the Company's April 4, 1984 letter to the Staff, region average discharges of greater than 38,000 MWD/MTU are not anticipated at least through the end of this decade.

If you have any further questions, please advise.

truly yours,

AMM/OWD/gj

cc: (see page #2)

8408240002 840817 PDR ADDCK 05000395 PDR Mr. Harold R. Denton Spent Fuel Rerack Modification August 17, 1984 Page #2

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