



SCE&G

NUMARC Company

D509

South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29066
(803) 345-4040

John L. Skolds
Vice President
Nuclear Operations

April 27, 1992

Robert C. Jones, Jr.
57FR6748

5/27/92
(8)

92 MAY -1 P1:19
USMRC
OFFICE OF ADMINISTRATION

Mr. David L. Meyer
Chief, Regulatory Publications Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Meyer:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON NUREG-1449,
SHUTDOWN AND LOW-POWER OPERATION AT COMMERCIAL
NUCLEAR POWER PLANTS IN THE UNITED STATES
(NRR 1449)

South Carolina Electric & Gas Company (SCE&G) appreciates the opportunity to review and comment on NUREG-1449. SCE&G endorses the NUMARC comments with the following exceptions:

1. During reduced inventory/midloop conditions SCE&G believes that one train of RHR should be required to be operable and the other train should be required to be functional.
2. Containment closure for reduced inventory conditions should be required prior to the onset of core boiling and defined as in Generic Letter 88-17.

SCE&G concurs with NUMARC that "...additional regulatory requirements imposed on outage planning and control are unnecessary and duplicative of industry efforts." The NRC should allow the industry to implement the NUMARC guidelines (NUMARC 91-06) prior to assessing the adequacy of utility programs or imposing regulatory requirements in the areas covered by NUMARC 91-06. SCE&G encourages the NRC to continue working with NUMARC to develop effective, complementary guidance in the shutdown/low power operations area.

If you have any questions, please call.

Very truly yours,

John L. Skolds

9205070017 920427
PDR NUREG
1449 C PDR

ARR:JLS:1cd

c: O. W. Dixon Jr.
R. R. Mahan
R. J. White
S. D. Ebnetter
G. F. Wunder
General Managers
NRC Resident Inspector

J. B. Knotts Jr.
J. F. Poole
S. E. Fipps
T. Pietrangelo (NUMARC)
RTS (NRR 1449)
File (811.10)