

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

September 28, 1984

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

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

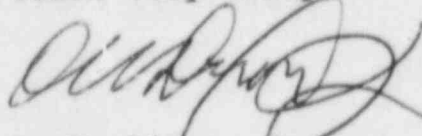
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Valve Test Relief Request
First Interval Inservice Inspection
Program

Dear Mr. Denton:

South Carolina Electric & Gas Company (SCE&G) hereby submits a revision to Valve Test Relief Request J.8. This relief request is used in conjunction with procedure GTP-302, "General Procedure for Inservice Testing of Valves." The relief request is being revised to reflect exercising the Safety Injection Accumulator Discharge Check Valves (XVC-8948 A, B, C, and XVC-8956 A, B, C) in lieu of valve disassembly as stated in the previous relief request. This revision is necessary in order to improve utilization of existing maintenance manpower and achievement of ALARA goals during each refueling outage.

If additional information is required, please contact us at your convenience.

Yours very truly,



O. W. Dixon, Jr.

ARK:LBC:OWD/dwf
Attachment

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
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C. A. Price
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L. B. Collier
NPCF
File

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VALVE TEST RELIEF REQUESTS

J. SYSTEM: SAFETY INJECTION (SI) SYSTEM

J.8(R1) Valve: XVC-8948 A, B, C and XVC-8956 A, B, C

Category: A/C

Class: 1

Function: Prevent reverse flow from the Reactor Coolant System to the Safety Injection (SI) Accumulators.

Test Requirement: Exercise check valves to the position required to fulfill their function, every three (3) months.

Basis for Relief: Testing these valves during plant operations would require initiating flow from the SI Accumulators to the Reactor Coolant System (RCS). The SI Accumulators do not have the required pressure to overcome normal Reactor Coolant System pressure; therefore, flow could not be established. During cold shutdown, injecting an additional large concentration of boron contained in the SI Accumulators into the RCS would require a large volume of reactor makeup water to dilute the boron concentration in the RCS. This would be inconsistent with normal startup procedures.

Alternate Test: Valves will be exercised to the position required to fulfill their function during each refueling outage.