



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4344

Gary J. Taylor
Vice President
Nuclear Operations

March 27, 1996

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
ASME SECTION XI RELIEF REQUEST - ADDENDUM (NRR 950001)

Ref: G. J. Taylor to Document Control Desk dated December 20, 1995 (RC-95-0315)

South Carolina Electric & Gas Company (SCE&G) hereby submits the following addendum to our letter dated December 20, 1995 (NRC TAC # M94364), requesting relief from the ASME Section XI requirements for Class 1 and 2 insulated pressure retaining bolted connections which receive VT-2 Visual Examination during the performance of System Pressure Testing.

The enclosure contains additional components for which this relief is requested. This relief is modeled after Code Case N-533, expanded to include specified Class 2 connections inside containment. This relief is to exempt the applicable Class 1 and 2 pressure retaining bolted connections that are insulated, in systems borted for the purpose of reactivity control. Specifically, SCE&G requests to exempt the additional applicable connections from the requirements of ASME Section XI IWA 5242(a), which specifies that insulation must be removed from pressure retaining bolted connections for VT-2 visual examination during the performance of System Pressure Testing.

As an alternate, SCE&G shall remove the insulation and conduct the VT-2 visual examination of pressure retaining bolted connections on applicable Class 1 connections once per refueling outage at static or atmospheric pressure. Applicable Class 2 connections will be similarly inspected once each inspection period during a refueling outage. Insulation will then be reinstalled and upon repressurization of a bolted connection, a four-hour hold time will be utilized to assess potential leakage.

SCE&G contends that the proposed alternate testing provides the equivalent, acceptable level of quality and safety as that provided by the Code. SCE&G desires relief from the above requirements so as not to create an undue hardship without a compensating increase in quality or safety.

SCE&G requests that the NRC review and approve this addendum as soon as possible, in order to support inspection activities scheduled to begin in April, 1996.



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Should you have any questions on this issue, please call Mr. M. J. Zaccone at (803) 345-4328.

Very truly yours,


STEPHEN A. BYRNE

Gary J. Taylor

MJZ/GJT/nkk
Enclosure

c: J. L. Skolds
W. F. Conway (w/o Enclosure)
R. R. Mahan (w/o Enclosure)
R. J. White
S. D. Ebnetter
J. I. Zimmerman
NRC Resident Inspector
J. B. Knotts Jr.
NSRC
DMS (RC-96-0089)
RTS (NRR 950001)
File (810.19-2)

Addendum to
Attachment I
Code Class 1 Bolted Connections

COMPONENT DRAWING	SIZE	CODE CLASS	COMPONENT DESCRIPTION	APPROXIMATE LOCATION
XVC08956A-SI 302-692 C-14	12"	1	SI ACCUM A DISCH HEADER CHECK VALVE	RB-412-227-48
XVC08956B-SI 302-692 E-14	12"	1	SI ACCUM B DISCH HEADER CHECK VALVE	RB-412-130-40
XVC08956C-SI 302-692 G-14	12"	1	SI ACCUM C DISCH HEADER CHECK VALVE	RB-436-032-60
XPP0030A 302-671 F-13	.75"	1	REACTOR COOLANT PUMP A SEAL #1 LEAKOFF LINE FLANGE	RB-436-245-35
XPP0030B 302-672 F-12	.75"	1	REACTOR COOLANT PUMP B SEAL #1 LEAKOFF LINE FLANGE	RB-436-125-35
XPP0030C 302-673 F-12	.75"	1	REACTOR COOLANT PUMP C SEAL #1 LEAKOFF LINE FLANGE	RB-436-030-35

Addendum to
Attachment II
Code Class 2 Bolted Connections

COMPONENT DRAWING	SIZE	CODE CLASS	COMPONENT DESCRIPTION	APPROXIMATE LOCATION
XVT08141A-CS 302-671 E-14	.75"	2	RC PUMP A SEAL LEAKOFF OUTLET VALVE	RB-436-245-36
XVT08141B-CS 302-672 E-13	.75"	2	RC PUMP B SEAL LEAKOFF OUTLET VALVE	RB-436-140-45
XVT08141C-CS 302-673 E-13	.75"	2	RC PUMP C SEAL LEAKOFF OUTLET VALVE	RB-436-050-45
XVT08142-CS 302-673 C-07	.75"	2	RC PUMP SEAL BYPASS HEADER ISOL VALVE	RB-412-252-47
XVC08462A-CS 302-671 C-13	1"	2	RCP "A" #1 SEAL LEAKOFF CHECK VALVE	RB-425
XVC08462B-CS 302-672 C-12	1"	2	RCP "B" #1 SEAL LEAKOFF CHECK VALVE	RB-423
XVC08462C-CS 302-673 C-12	1"	2	RCP "C" #1 SEAL LEAKOFF CHECK VALVE	RB-424
HCV00137-CS 302-673 B-07	1"	2	EXCESS LETDOWN HT EXCH FLOW CONTROL VLV	RB-412-350-50
XVT08112-CS 302-673 C-04	2"	2	RC PUMP SEAL RETURN HDR ISOL VLV (IRC)	RB-412-285-68
XVR08117-CS 302-673 A-10	2"	2	LETDOWN FLOW CONTROL HDR RELIEF VALVE	RB-412-030-52
XVR08121-CS 302-673 C-04	2"	2	RC PUMP SEAL RETURN HEADER RELIEF VALVE	RB-412-285-62
XVT08142-CS 302-673 C-07	.75"	2	RC PUMP SEAL BYPASS HEADER ISOL VALVE	RB-412-252-47
XVM08143-CS 302-673 B-05	1"	2	LETDOWN 3 WAY VALVE	RB-412-350-50
XVT08146-CS 302-673 B-13	3"	2	RCS NORMAL CHARGING HEADER ISOL VALVE	RB-412-030-52
XVT08147-CS 302-673 A-13	3"	2	RCS ALTERNATE CHARGING HEADER ISOL VLV	RB-412-030-52
XVC08381-CS 302-673 A-04	3"	2	CVCS CHARGING HEADER CHECK VALVE (IRC)	RB-412-285-52

Addendum to
Attachment II
Code Class 2 Bolted Connections

COMPONENT DRAWING	SIZE	CODE CLASS	COMPONENT DESCRIPTION	APPROXIMATE LOCATION
XVT08879A-SI 302-692 C-13	.75"	2	XVC08948A-SI TEST LINE ISOLATION VALVE	RB-412-227-48
XVT08879B-SI 302-692 E-13	.75"	2	XVC08948B-SI TEST LINE ISOLATION VALVE	RB-412-130-40
XVT08879C-SI 302-692 G-13	.75"	2	XVC08948C-SI TEST LINE ISOLATION VALVE	RB-436-015-58
XPP0030A 302-671 F-13	.75"	2	RC PUMP A #2 SEAL LEAKOFF LINE FLANGES	RB-436-245-35
XPP0030B 302-672 F-12	.75"	2	RC PUMP B #2 SEAL LEAKOFF LINE FLANGES	RB-436-125-35
XPP0030C 302-673 F-12	.75"	2	RC PUMP C #2 SEAL LEAKOFF LINE FLANGES	RB-436-030-35