

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

December 14, 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 Storage Racks
Coupon Sampling

Dear Mr. Denton:

On January 23, 1984 South Carolina Electric and Gas Company (SCE&G) made a submittal requesting approval of a proposed modification to rerack the spent fuel pool at the Virgil C. Summer Nuclear Station. This modification and the associated Technical Specification changes were approved by the Nuclear Regulatory Commission (NRC) in a letter to Mr. O. W. Dixon, Jr., dated September 27, 1984. This modification consisted of removing the old storage racks and replacing them with new, high density storage racks. These new racks are the free standing, modular design variety, some of which contain Boraflex as a neutron absorber material. This letter is hereby provided at the NRC Staff's request to clarify the schedule for removing and testing the Boraflex sample coupons.

In the January 23, 1984 submittal, a proposed schedule for removing these samples was outlined. This schedule called for the removal of two coupon samples at each of the following times: 90 days, 180 days, one year, five years, 10 years, 15 years, 20 years, 30 years, and 40 years following installation of the racks. After further discussion with the rack manufacturer, they recommended that this schedule be revised and replaced with an alternate schedule. This schedule, which SCE&G has subsequently proceduralized, is as follows:

At each of the next eight refueling cycles following installation of the racks, remove and test two coupon samples. Also remove and test two coupons every five years for the next 40 years following installation of the racks.

This revised schedule allows for a more frequent sampling of the Boraflex material than the previously identified schedule. The

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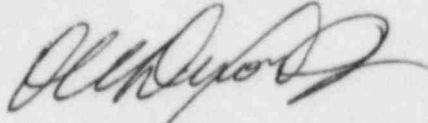
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90 and 180 day sampling which was included in the original schedule was deleted from the inspection at the recommendation of the rack manufacturer. These particular samples were considered to be too soon after installation to provide any meaningful performance data on the absorber material. The new schedule provides for more frequent coupon surveillance to be performed over the life of the plant than the previous schedule, and is therefore considered to be a more thorough testing frequency.

If you have any questions, please advise.

Very truly yours,



O. W. Dixon, Jr.

AMM/OWD/gj

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