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April 18, 1988

DOCKET NUMBER PR -50
PROPOSED RULE

CHAS. E. NEUMAN
Vice President
Nuclear Operations

(53 FR 8924)

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Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

OFFICE OF THE SECRETARY
DOCKETING DIVISION
WASHINGTON, D.C.

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Proposed Rule
Licensee Announcements of
Inspectors

Dear Mr. Chilk:

South Carolina Electric & Gas Company (SCE&G) has reviewed the proposed change to 10CFR50.70 which was published in the March 16, 1988 Federal Register dealing with the announcement of inspectors visiting a power reactor site. The following discussion of the proposed rule is being provided since SCE&G considers the rule to be undesirable from both an RC and utility perspective.

SCE&G considers the announcement to key management personnel that an inspector has arrived on site to be very beneficial to the accomplishment of the goals of the inspectors. If management is informed as to the area in which the inspector is interested, contact personnel within the utility organization (or the management themselves) can be designated to provide assistance to the inspector to enable him to more effectively perform an inspection. If the utility is unaware the inspector is onsite, the inspector is forced to deal with unfamiliar surroundings, lack of indepth knowledge about plant specific procedures and policies, potential inability to contact those individuals best suited for (or even familiar with) his specific inspection area, and a general lack of potentially useful and timesaving assistance. In actuality, an inspector's surveillance can potentially be conducted in much greater detail with more thoroughness, provided the Licensee is aware of his existence and can readily provide any necessary assistance.

The announcement of an inspector's arrival to essential personnel should not alter the overall attention and performance level of the Licensee. Adherence to approved procedures and company policies is stressed to all personnel for all shifts, including days, nights, weekends, and holidays regardless of the supervision being provided to the activity. At an inspector's special request to utility management upon arriving on site, further notification of his presence to plant personnel can be postponed to allow for ongoing activities to be observed by the inspector without the observed individual's specific knowledge. However, this specific type request should be handled on an individual basis and not as a formal rule change. In general, SCE&G contends that the utility management on duty is ultimately responsible for the safe operation of the unit and they should, at all times, be aware of visitors (including inspectors) on site.

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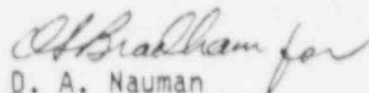
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SCE&G is aware of the NUMARC industry response to the proposed rule and is in agreement with its initiative. The opportunity to comment on this proposed rule is appreciated and the NRC staff is encouraged to reconsider the necessity of this rule change.

If you should have any questions, please advise.

Very truly yours,


D. A. Nauman

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