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DOCKETED  
USNRC

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97 DEC -1 P1:52 RC-97-0243  
November 26, 1997

Secretary of The Commission  
ATTN: Rulemakings and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATION STAFF

DOCKET NUMBER  
PROPOSED RULE PR 50  
(62FR53975)  
(62FR53932)

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
COMMENTS ON PROPOSED RULE CHANGE TO INCORPORATE  
IEEE 603 STANDARD

South Carolina Electric & Gas (SCE&G) Company submits the following comments pursuant to the subject proposed rule change.

COMMENTS

1. The proposed rule change regarding the incorporation of IEEE 603 Standard should be considered as a mandated backfit. The "voluntary" changes (i.e. modifications) which are necessary for protective systems to maintain the required reliability will impose new, more stringent requirements on these future changes (and possibly the entire system) which will have a significant impact on the cost and schedule, while delaying changes which would enhance plant safety.
2. The proposed rule change could result in a dual licensing basis within a system, introducing significant confusion, since IEEE 603 is written as a system standard.
3. There has been insufficient dialogue between the NRC and the industry on this proposed rule change. (Draft Guide 1042 was an endorsement of IEEE 603 Standard and did not carry the same potential impact as a rule change.)
4. As currently written, the applicability of the Standard is subject to interpretation. (i.e. Will the change out of one component invoke IEEE 603 for the entire system? )
5. The proposed rule change for endorsement of IEEE 603 should not be a rule change. The regulatory guide process is a sufficient method for the endorsement of new Standards.

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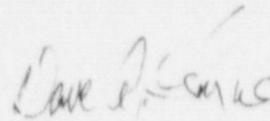
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In the view of SCE&G, the NRC should present a sufficient comment period to allow the industry to assess the proposed rule change and its potential impact on operating plants.

Should you have any questions, please contact Mr. Jeffrey Pease of my staff, at (803) 345-4124, at your convenience.

Very truly yours,



Dave A. Lavigne

DAL/jwp

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