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*DS 09  
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*63 FR 4498  
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RC-98-0022  
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Chief, Rules and Directives Branch  
Division of Administrative Services  
Mail Stop T6-D69  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
COMMENTS ON PROPOSED GENERIC LETTER 98-XX, "YEAR 2000  
READINESS OF COMPUTER SYSTEMS AT NUCLEAR POWER  
PLANTS (MA0138)"

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US NRC

South Carolina Electric & Gas (SCE&G) Company submits the following comments pursuant to the NRC's request.

NRC PROPOSAL

Requires that electric utility reactor licensees provide written confirmation of implementation of their program(s) to address the Year 2000 (Y2K) problems in computer systems, to include embedded systems, at their facilities, within 90 days of the date of the Generic Letter.

COMMENTS

- The Nuclear Industry has already begun extensive preparations for the Y2K, which address this issue in accordance with NEI guidance.
- Further oversight would be an unnecessary burden, not commensurate with the safety significance of this issue.

NRC PROPOSAL

Requires that electric utility reactor licensees provide written certification, no later than July 1, 1999, that their facility is Y2K ready and in compliance with the terms and conditions of their license(s) and NRC regulations. This certification response should contain a status report of work remaining to be done to complete the licensees Y2K program, including completion schedules.

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PDR I&E  
MISC PDR



COMMENTS

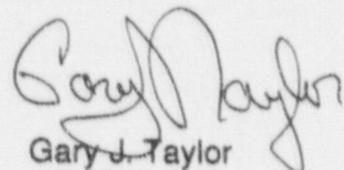
- The NRC is effectively reducing the time allowed for utilities to become Y2K ready by six months.
- The financial impact to some licensees, forced to plan an additional outage for remediation of components not accessible during power operations, is not justified by the safety significance of this issue.
- The procurement process for some replacement components, which are industry wide with few approved suppliers, may prohibit licensees from achieving Y2K readiness within the reduced timeframe.

GENERAL COMMENTS

- In accordance with the present reportability requirements, SCE&G will report any Y2K problems which fall into the realm of 10 CFR 21, 10 CFR 50.72, or 10 CFR 50.73, that cannot be made year 2000 ready by December 31, 1999.
- In light of the industry guidance provided by NEI, the limited replacement and qualified personnel resources available, it is recommended that the proposed generic letter not be issued.

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

Very Truly yours,



Gary J. Taylor  
Vice President, Nuclear

GJT/ARR/jwp

cc: K.W. Nettles  
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NRC Resident Inspector  
RTS MSP980001  
File (810.32)  
DMS