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PROPOSED RULE (53FR 47822)

May 16, 1989

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The Honorable Lando W. Zech, Jr.
Chairman
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Proposed Maintenance Rulemaking

Dear Chairman Zech:

The purpose of this letter is to reemphasize the South Carolina Electric & Gas Company (SCE&G) commitment to the past, present and future performance of quality maintenance and preventive maintenance at the Virgil C. Summer Nuclear Station (VCSNS). Extensive management support and involvement with various industry organizations such as NUMARC and INPO, coupled with a strong dedication to quality performance ethics and program adherence by SCE&G employees, has been responsible for the current outstanding maintenance organization at VCSNS. The quality of the SCE&G maintenance program has been noted by both the NRC and INPO in two consecutive Category I SALP ratings and the most recent Category I INPO plant rating.

An industry commitment to the "Pursuit of Excellence" is considered the backbone to a strong and effective organization. The VCSNS maintenance organization has been a leader in implementing this philosophy within SCE&G. A personal commitment by each employee to perform his work to the best of his ability is the necessary ingredient to successful work practices. The VCSNS maintenance organization has proven through demonstrated performance that leadership, cooperation, program implementation, and attention to detail are responsible for improving overall maintenance. These elements for outstanding maintenance practices have been instilled by a cooperative effort between the overall nuclear industry, SCE&G management, and VCSNS workers.

The proposed maintenance rulemaking is not viewed as necessary for the improvement of maintenance within SCE&G. The SCE&G desire for further improvement is a philosophy driven by a commitment to excellence. Past performance proves a strong devotion to maintenance activities; the Company and industry commitment to excellence, not regulatory requirements, is the basis for future improvements. SCE&G has made that commitment.

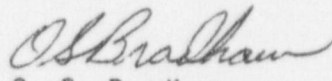
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Your cooperation in working with the industry in the area of maintenance rulemaking is greatly appreciated.

Very truly yours,


O. S. Bradham

AMM/OSB:lcd

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RTS (PR 880030)
File (811.02)