

From: [Zach Turner](#)
To: Yan.Gao@dominionenergy.com
Cc: [Ed Miller](#); [Jack Minzer Bryant](#)
Subject: Acceptance Review for VC Summer Relief Requests RR-5-V1, RR-5-V2, and RR-5-V3 (EPIDS L-2023-LLR-0067, L-2023-LLR-0068, and L-2023-LLR-0069)
Date: Thursday, January 25, 2024 7:52:00 AM

Yan,

By letter dated December 21, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23361A104), Dominion Energy South Carolina (DESC, the licensee) submitted three relief requests for Virgil C. Summer Nuclear Station (VCSNS) Unit 1.

The first proposed relief request, RR-5-V1, is requesting relief under 10 Code of Federal Regulations (CFR) 50.55a(f)(5)(iii) from the American Society of Mechanical Engineers (ASME), Operation and Maintenance (OM) Code, Operation and Maintenance of Nuclear Plants, 2020 Edition for VCSNS's fifth Inservice Testing (IST) Interval due to impracticality. Specifically, the proposed relief request would grant relief from verifying two service water check valves are able to shut due to the valves being inaccessible.

The second proposed relief request, RR-5-V2, is requesting to use an alternative method under 10 CFR 50.55a(z)(1) from the ASME OM Code, Operation and Maintenance of Nuclear Plants, 2020 Edition for VCSNS's fifth Inservice Testing (IST) Interval. Specifically, the licensee is requesting to use performance-based testing frequency on 37 valves to change the testing frequency from every refueling outage to every fourth refueling outage, subject to acceptable valve performance.

The third proposed relief request, RR-5-P1, is requesting to use an alternative method under 10 CFR 50.55a(z)(1) from the ASME OM Code, Operation and Maintenance of Nuclear Plants, 2020 Edition for VCSNS's fifth Inservice Testing (IST) Interval. Specifically, the licensee is requesting to use the method identified in Generic Letter 89-04 (ML031150259) to measure recirculation flows for three Charging/Safety Injection centrifugal pumps.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of these relief requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical

review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 120 hours to complete for RR-5-V1, 120 hours to complete for Relief Request RR-5-V2, and 120 hours to complete for RR-5-P1. The NRC staff expects to complete this review by December 19, 2024. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

If you have any questions, please contact me.

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