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64FR 45985 Aug. 23 1999

Rules and Directives Branch Office of Administration U. S. Nuclear Regulatory Commission Washington, DC 20555 Dear Sir:

Subject:

Gary J. Taylor Vice President Nuclear Operations

South Carolina Electric & Gas Co Virgil C. Summer Nuclear Station P. O. Box 88 Jenkinsville, South Carolina 29065

803.345.4344 803.345.5209 www.scana.com VIRGIL C. SUMMER NUCLEAR STATION DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
COMMENT ON DG-1080, PROPOSED REVISION 3 TO REGULATORY GUIDE 1.149

South Carolina Electric and Gas Company has the following comment on proposed revision 3 to Regulatory Guide 1.149, "Nuclear Power Plant Simulation Facilities for use in Operator Training and License Examinations".

Section C.4 states that "The licensee may reference the licensed operator training schedules of the accredited training program as adequate submittal of a schedule for conduct of approximately 25% per year of the performance tests as required by 10CFR55.45.

We assume, if all scenarios are currently approved, that a complete revalidation is not required. Proper documentation of validation is that they are approved scenarios. If you have any questions, please call Tom Howell of my staff at (803) 931-5090.

ery truly yours,

CAC/GJT/mb

c: J. L. Skolds W. F. Conway J. J. Galan R. J. White L. A. Reyes K. R. Cotton

NRC Resident Inspector J. B. Knotts, Jr. NSRC RTS (REG 990008) File (811.05) DMS (RC-99-0195)

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

PDR REGGD