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64 FR 40394
July 26, 1999

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1999 DEC 28 PM 3:16

December 22, 1999
RC-99-0233

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RULES & DIR. BRANCH
US NRC

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: T-6D59
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 THE PILOT PROGRAM FOR THE NEW
REGULATORY OVERSIGHT PROCESS (64-40394)

South Carolina Electric & Gas Company (SCE&G) has reviewed the Federal Register Notice "Public Comment on the Pilot Program for the New Regulatory Oversight Program" published in the *Federal Register* on July 26, 1999 (64 Fed. Reg. 40394). In addition to the review of this document, SCE&G has reviewed the NEI comments prepared on behalf of the nuclear industry. SCE&G concurs with the NEI comments, however SCE&G feels it is necessary to specifically comment on the issue of reporting data.

The comments are as follows:

The requirement to submit the data within 14 days of the end of each reporting period should be extended. To ensure accuracy of the data and to submit the data within this time interval would require additional resources to assure the quality of the data. SCE&G feels that extending the interval to within 30 days of the end of each reporting period would be appropriate.

SCE&G would also like to reaffirm comments previously made concerning the new oversight process (ref. Letters from G. J. Taylor to NRC dated February 22, 1999 and May 17, 1999). SCE&G appreciates the opportunity to review and provide comments on this new process.

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

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MSP 990005; O-L-99-0085
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Should you have any questions, please call Ms. Susan B. Reese at (803) 345-4591.

Very truly yours,

Sgt. A. Bue For GJT

Gary J. Taylor

SBR/GJT/dr

c: J. L. Skolds
J. J. Galan
R. J. White
K. R. Cotton
R. E. Beedle
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RTS (MSP 990005, O-L-99-0085)
File (815.16)
DMS (RC-99-0233)