SCE&G
A SCANA COMPANY

September 14, 2000
RC-00-0296

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: K. R. Cotton

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
TECHNICAL SPECIFICATION AMENDMENT REQUEST
TSP 00-0082 DELETION OF ISEG

Stephen A. Byrne
Vice President
Nuclear Operations
803.345.4622

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS). This request is being submitted pursuant to 10 CFR 50.90.

The proposed changes will delete Section 6.2.3 and revise Sections 6.3.1 and 6.5.2.8 to remove the references to the Independent Safety Engineering Group (ISEG). These proposed changes are also very similar to those approved for the South Texas Nuclear Generating Plant, Units 1 and 2, on June 23, 1999 (TAC Nos. MA-4995 and MA-4996) and the Tennessee Valley Authority's Browns Ferry, Watts Bar and Sequoyah Nuclear Plants on August 26, 1999 (TAC Nos. MA5105, MA5106, MA5107, MA5054, MA5055, and MA5056).

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

NUREG-0737, "Clarification of TMI Action Plan Requirements", required the formation of ISEGs to address perceived shortcomings in the industry in monitoring facility operations and design activities; however, much has changed in the nuclear industry as a whole and specifically at VCSNS since issuance of NUREG-0737 such that the ISEG is no longer necessary. The contribution of the five dedicated engineers, kept separate and independent, is not significant in comparison to the contribution of the overall site organization to the safe operation of the facility.

Included in this request are proposed changes to the Operational Quality Assurance Plan (OQAP) that compliment this change request. Following approval of this Technical Specification change request, VCSNS will delete the references to ISEG from the OQAP pursuant to 10 CFR 50.54(a)(3). Corresponding changes will also be made to the Final Safety Analysis Report, Sections 13 and 17.

A001

SCE&G desires that this amendment request be approved by January 1, 2001, to permit efficient re-allocation of personnel as soon as possible. A 30 day implementation period is requested to permit time for the program documents to be revised prior to implementation.

TS page 6-3 is also affected by another change request in process (TSP 99-0263) and a supplemental submittal will be provided if the other change is approved first.

This TS amendment request contains the following attachments:

Attachment I	(1) Remove/Insert Page Table (2) Explanation of Changes Summary (3) Marked-up Technical Specification Pages (4) Revised Technical Specification Pages (5) Marked-up Operational Quality Assurance Plan Pages
Attachment II	Safety Evaluation
Attachment III	No Significant Hazards Evaluation
Attachment IV	Environmental Impact Determination
Attachment V	Commitments to Assure Independent Verification of Plant Activities

This proposed amendment has been reviewed and approved by the Plant Safety Review Committee and the Nuclear Safety Review Committee.

I certify under penalty of perjury that the following is true and correct.

Should you have questions, please call Mr. Arnie J. Cribb, Jr. at (803) 345-4346.

Very truly yours,

Stephen A. Byrne

AJC/SAB
Attachment(s): 4

c: N. S. Carns
T. G. Eppink (w/o Attachment)
R. J. White
L. A. Reyes
N. M. Smith
NRC Resident Inspector
P. Ledbetter
J. B. Knotts, Jr.
T. P. O'Kelley
RTS (TSP 00-0082)
File (813.20)
DMS (RC-00-0296)

STATE OF SOUTH CAROLINA :
: **TO WIT :**
COUNTY OF FAIRFIELD :

I hereby certify that on the 14th day of September 2000, before me, the subscriber, a Notary Public of the State of South Carolina personally appeared Stephen A. Byrne, being duly sworn, and states that he is Vice President, Nuclear Operations of the South Carolina Electric & Gas Company, a corporation of the State of South Carolina, that he provides the foregoing response for the purposes therein set forth, that the statements made are true and correct and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal

Notary Public

My Commission Expires July 13, 2005
Date

Attachment To License Amendment No. XXX
To Facility Operating License No. NPF-12
Docket No. 50-395

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages	Insert Pages
Index Page XVIII	Index Page XVIII
6-3	6-3
6-8	6-8

SCE&G -- EXPLANATION OF CHANGES

Page	Affected Section	Bar #	Description of Change	Reason for Change
XVII	Index	1	Remove reference to the ISEG	To delete the requirement for the ISEG
6-3	6.2.3	1	Delete entire section	To delete the requirement for the ISEG
6-3	6.3.1	2	Remove the ISEG qualification requirements	To delete the requirement for the ISEG
6-8	6.5.2.8	1	Remove the ISEG audit function	To delete the requirement for the ISEG

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6.2.3 ~~INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)~~ (NOT USED)

~~FUNCTION~~

~~6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.~~

~~COMPOSITION~~

~~6.2.3.2 The ISEG shall be composed of a multi-disciplined dedicated onsite group with a minimum assigned complement of five engineers or appropriate specialists.~~

~~RESPONSIBILITIES~~

~~6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.~~

~~AUTHORITY~~

~~6.2.3.4 The ISEG shall make detailed recommendations for procedure revisions, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the General Manager, Nuclear Safety.~~

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975~~, and the members of the Independent Safety Engineering Group, each of whom shall have a Bachelor of Science degree or registered Professional Engineer and at least two years experience in their field. At least one year experience shall be in the nuclear field.~~

6.4 NOT USED

~~*Not responsible for sign-off function.~~

AUDITS

6.5.2.8 The NSRC shall have cognizance of the audits listed below. Audits may be performed by using established SCE&G groups such as ~~the ISEG and~~ QA or by outside groups as determined by the NSRC. Audit reports or summaries will be the basis for NSRC action:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training and qualifications of the entire unit staff.

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety.

d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50.

e. The Emergency Plan and implementing procedures.

f. The Security Plan and implementing procedures.

g. Any other area of unit operation considered appropriate by the NSRC or the Vice President, Nuclear Operations.

h. The Fire Protection Program and implementing procedures.

i. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or a qualified outside firm.

j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

k. The radiological environmental monitoring program and the results thereof, including the performance of activities required by the quality assurance program per R.G. 4.15 Rev. 1, February 1979.

l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.

m. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.

AUTHORITY

6.5.2.9 The NSRC shall report to and advise the Vice President, Nuclear Operations, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

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a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training and qualifications of the entire unit staff.

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety.

d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50.

e. The Emergency Plan and implementing procedures.

f. The Security Plan and implementing procedures.

g. Any other area of unit operation considered appropriate by the NSRC or the Vice President, Nuclear Operations.

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The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.

AUTHORITY

6.5.2.9 The NSRC shall report to and advise the Vice President, Nuclear Operations, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

Reporting to the GMNSS are the following:

A. QUALITY SYSTEMS

The Manager, Quality Systems, is responsible for:

1. Management of Quality Systems activities associated with the Nuclear Operations Division. Tasks included within these activities are:

   a. Providing the VPNO with assurance of compliance to regulatory codes and standards, through audits, surveillance, assessments and/or reviews

   b. Identification of any quality problems to appropriate NOD management

   c. Selected Health Physics oversight requirements such as:

      1) Inputting information to the SCE&G ALARA Program

      2) Developing the necessary oversight of procedures to monitor the performance and scope of activities of Health Physics

      3) Developing, recommending, implementing and overseeing programs with regard to radiological affairs

      4) Providing Health Physics support and recommendations to plant design and operational activities through technical reviews

   d. Implementation of the QC inspection and Inservice Inspection programs.

   e. Administering the Station Nonconformance Program

   f. Administering the Condition Evaluation Report Program

~~2. Management of the Independent Safety Engineering Group (ISEG).~~

~~Providing independent review of plant activities to verify compliance to the operating license. These activities may include evaluation of plant operating characteristics, NRC issues, industry advisories, or others.~~

2 ~~3~~. Trending of quality activities and programs.

CHG A

B. NUCLEAR LICENSING AND OPERATING EXPERIENCE

The Manager, Nuclear Licensing and Operating Experience is

3.3 INDEPENDENT REVIEW

3.3.1 Administrative controls have been established in procedures which provide for independent review of plant activities. Overview functions have been developed for the following activities:

A. Review of safety evaluations conducted under 10CFR50.59

B. Changes in Technical Specifications and licensing amendments

C. Violations or deviations from Technical Specifications, FSAR requirements, procedures, codes and standards

D. Significant operating abnormalities

E. Other matters concerning safe plant operation

3.3.2 Independent overview responsibilities have been delegated to the following organizations

A. Nuclear Safety Review Committee(NSRC) and Plant Safety Review Committee (PSRC)

B. Licensing

C. Quality Systems, and Health Physics Overview

D. ~~Independent Safety Engineering Group~~

3.3.3 Programs and Procedures

Each independent review group has administrative procedures which describe their function. Individual responsibilities are delineated in section 2.0 of this plan.

A. Design Engineering procedures provide controls such that the original design basis is maintained.

B. Materials and Procurement procedures provides instructions for the control of materials and services from the initiation of the purchase requisition through issuance. These procedures include the specification of technical and quality requirements, manufacturing surveillance and vendor audit, receiving inspection and warehouse control, and stores issuance.

C. Plant Support Engineering procedures are developed for activities that affect quality. CHG A

4.4.11 Nuclear Support Services procedures describe the methods of operation to be used by Nuclear Support Services personnel in support of the VCSNS. Each Nuclear Support Services department performs their functions through detailed procedures as described in the following paragraphs:

A. Quality Systems procedures specify the techniques utilized by Quality Systems personnel in the conduct of safety related activities. Activities performed by this department include Quality Assurance, Quality Control, ~~Independent Safety Engineering,~~ Health Physics overview and administration of the Condition Evaluation Report program. CHG B CHG A

B. Nuclear Licensing procedures describe the interface and communication with the NRC and other regulatory agencies,evaluation of NRC and industry issues, and provide for regulatory tracking.

C. Records and Document Control procedures are developed to govern activities which are performed by the Records and Document groups. Included are drawing and document control and records management procedures.

D. Nuclear Training procedures describe controls and processes for a systematic approach for the development and implementation of training at VCSNS.

SAFETY EVALUATION FOR REVISING SPECIFICATIONS 6.2.3, 6.3.1 and 6.5.2.8 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

DESCRIPTION OF AMENDMENT REQUEST

South Carolina Electric & Gas Company (SCE&G) proposes a change to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) to delete the Independent Safety Engineering Group (ISEG).

TS 6.2.3 describes the function, composition, responsibilities, and authority of the ISEG. TS 6.3.1, in part, describes the qualification requirements of the members of the ISEG. TS 6.5.2.8 describes the requirement for the Nuclear Safety Review Committee (NSRC) to have cognizance of the audits performed by the ISEG. These Technical Specifications were implemented in response to NUREG-0737, "Clarification of TMI Action Plan Statements," which stated that each applicant for an operating license shall establish an onsite ISEG to perform independent reviews of plant operations.

The ISEG composition requirement restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public. Assigning the duties and qualifications specifically to the ISEG is not necessary because the requirements are satisfied by other aspects of the VCSNS organization. Therefore, VCSNS proposes to delete the ISEG from organizational requirements, with supporting changes to the Operations Quality Assurance Plan (OQAP). No significant hazard to the health and safety of the public is created by this change.

SAFETY EVALUATION

As described in NUREG-0737, the ISEG organizational structure can be considered to be an interim arrangement. Organizational and procedural changes at VCSNS following issuance of NUREG-0737 have made continued inclusion of the ISEG in the plant organization unnecessary.

Since the issuance of NUREG-0737, VCSNS has implemented the following:

- The Plant Support Engineering Group has been developed to provide individuals responsible for monitoring the performance and reliability of plant systems and equipment. This is an enhancement over typical industry practice in 1979.

- Capability of onsite engineering staff has been improved, with reduced reliance on architect/engineers.

- Quality programs have been improved with the capability to address concerns typically handled by an ISEG organization. The Quality organization is staffed with technically competent personnel, including personnel that have been previoulsy licensed or certified.

- A system for review of facility design and operation through self-assessments and independent assessments is used for proactive identification of potential concerns. This was not a common practice in 1979.

- The corrective action program has evolved considerably since 1979, along with the ability to trend identified concerns to ensure effectiveness of corrective actions.

- Oversight functions are provided by several groups in addition to the Plant Safety Review Committee (PSRC) and Nuclear Safety Review Committee (NSRC). They include a group of senior engineers that review engineering changes, a working group that reviews problems/concerns entered in the corrective action program, a group of site management that reviews significant plant events, and a separate group of site management that reviews the results of corrective actions.

- Industry plant design and operating experience information is reviewed and disseminated to site organizations for review and/or action, as appropriate. This information, including all actions taken in response to the item, is tracked in the corrective action program.

Virgil C. Summer Nuclear Station (VCSNS) Technical Specification (TS) 6.2.3 and 6.3.1 delineate the requirements for the Independent Safety Engineering Group (ISEG), as shown below:

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of a multi-disciplined dedicated onsite group with a minimum assigned complement of five engineers or appropriate specialists.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification * that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for procedure revisions, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the General Manager, Nuclear Safety.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the members of the Independent Safety Engineering Group, each of whom shall have a Bachelor of Science degree or registered Professional Engineer and at least two years experience in their field. At least one year experience shall be in the nuclear field.

6.4 NOT USED

* Not responsible for sign-off function.

The following evaluation describes how the VCSNS site organization ensures that the functions in NUREG-0737 for an ISEG are implemented.

Examine plant operating characteristics:

As part of its corrective action program, VCSNS has implemented a Condition Evaluation, Reporting, and Trending system (CER program) which provides a process for identifying, classifying, trending, reporting, and correcting situations requiring further review, evaluation, and/or action for resolution. Conditions that are potentially adverse to quality, safety or the reliability of VCSNS are to be reported in accordance with the CER program. Conditions that are subsequently designated as "High Significance" or are related to a plant structure, system or component are to be reported to the Control Room immediately for Shift Supervisor review. This process provides plant personnel with the opportunity to identify potential concerns with plant and system operability. The responsibility for identifying and reporting potential concerns is not limited to any one group, so that a condition can be reported by anyone and dispositioned appropriately.

Independent oversight activities (audits, performance monitoring, surveillance, assessments, and evaluations) are performed by the Quality Systems organization during refueling outages, startup activities, and normal and off-normal operational activities. Areas to be monitored are determined based on safety significance, past performance, regulatory requirements, and customer request. Independent oversight areas include operations, maintenance, engineering, support activities, and procurement. Performance information is collected, analyzed, and reviewed in accordance with the OQAP to determine the appropriate oversight (i.e., audit, assess, review, monitor, evaluate, or inspect) to be applied to the area under consideration.

Surveillance activities are performed by Quality Systems to verify conformance with specified requirements and industry good practices, and to evaluate their adequacy and effectiveness. Audits performed by Quality Systems are documented in accordance with written procedures to verify, by examination and evaluation of objective evidence, that applicable elements of the quality assurance program have been developed, documented, and effectively implemented in accordance with specified requirements. Assessments/evaluations, performed by various site groups, are systematic examinations of plant systems/components, various plant activities or incidents that assess the effectiveness of work practices and/or management controls.

The VCSNS corrective action program includes a root cause evaluation program and is administered by the Nuclear Licensing and Operating Experience Group. The program is a independent oversight function and provides uniform approach for performing cause analyses of problems or concerns associated with structures, systems and components, as well as human performance concerns. These concerns may be identified as needing cause and corrective action in accordance with the Maintenance Rule Program implementation. They may also be identified by VCSNS Supervisors as concerns or

problems requiring root cause evaluation. Corrective actions associated with root cause analyses are entered into the corrective action program.

VCSNS has implemented a Maintenance Rule Program to ensure compliance with 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Under this program, the effectiveness of maintenance activities for risk significant plant equipment is monitored in order to minimize the likelihood of failures and events. The performance or condition of certain structures, systems, and components is monitored against established performance criteria and goals in a manner sufficient to provide reasonable assurance that those structures, systems, and components are capable of performing their intended functions.

System performance and reliability are systematically reviewed in the Plant Support Engineering Department. The results are reported to station management to keep them aware of problems or concerns. These issues are reported in accordance with the corrective action program.

VCSNS has established a Probabilistic Safety Assessment Group responsible for the development and maintenance of station probabilistic risk and safety analyses. Their function ensures that plant performance and operating characteristics are modeled for risk management.

As an additional oversight activity, VCSNS has established a management team to provide oversight of corrective actions described in the various corrective action programs at VCSNS, including; timeliness, effectiveness, and priority of corrective action. They also evaluate program and root cause effectiveness. The results of their overviews and recommendations are provided to the responsible VCS manager(s) for information and action.

Examine NRC issuances, industry advisories and Licensee Event Reports:

VCSNS has established a Nuclear Licensing and Operating Experience (NL&OE) Group comprised of technically qualified people to review NRC issuances and industry advisories (which includes documents from the Institute of Nuclear Power Operations) for review of information on plant design and operating experience. This group is listed in the Operational Quality Assurance Plan, and reports to the General Manager, Nuclear Support Services through the Manager, Nuclear Licensing and Operating Experience.

Routine review of NRC and Institute of Nuclear Power Operations (INPO) plant status reports by NL&OE personnel provides insight into industry activities and practices. Many of these activities result in Licensee Event Reports (LER) being generated by the various utilities. This information is reviewed for applicability to VCSNS.

In addition, NL&OE personnel develop Licensee Event Reports pursuant to 10 CFR 50.73 as applicable following review of conditions identified in the corrective action program which are identified as reportable. The cause of the circumstances leading to a LER is determined through an investigation of the condition as part of the corrective action program. Actions resulting from the investigation are tracked in the corrective action program database. LERs are subject to review by the PSRC and the NSRC.

Review of other appropriate sources of plant design and operating experience information:

Plant design and operating experience information provided directly from other sources (such as Westinghouse, General Electric, and other vendors) to VCSNS, as well as information gathered from participation in industry owners' groups, is reviewed by NL&OE personnel, and provided to site organizations for review as appropriate. An overview activity is performed and is documented with this second level review. This information is tracked in a regulatory tracking system, including all actions taken in response to the item.

Make detailed recommendations for procedure revisions, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the General Manager, Nuclear Safety:

Recommendations resulting from root causes and corrective actions may be provided to the General Manager, Nuclear Support Services in accordance with the corrective action program and as a result of independent oversight activities performed by the Quality Systems group. NOTE: The title for General Manager, Nuclear Safety has been changed to General Manager, Nuclear Support Services. The safety culture at VCSNS is one which promotes recommendations for safety and efficiency by all personnel to their respective management, not just to the General Manager, Nuclear Support Services.

QUALIFICATIONS

Personnel performing the tasks described above are appropriately qualified for their responsibilities and, as applicable, receive on-going training in accordance with the training program at VCSNS. Personnel in the Quality Systems organization, Engineering Services organization and Nuclear Licensing and Operating Experience Group include engineers with a degree in Engineering or a related science.

INDEPENDENCE

Formation of the ISEG was intended to provide independent verification of plant activities. VCSNS has implemented various programs/processes that utilize independent verification of activities inherently in the process.

Independent oversight acitvities are performed by the VCSNS Quality Systems organization. The Quality Systems group reports to the General Manager, Nuclear Support Services and is therefore independent of line operations.

Implementation of the Maintenance Rule at VCSNS provides for monitoring equipment performance against established performance criteria and goals. This arrangement ensures that monitoring and review practices have appropriate independence from line operations.

The Nuclear Licensing and Operating Experience Group reports to the General Manager, Nuclear Support Services, and as such is afforded independence from plant operations.

VCSNS Operations Group has implemented an Independent Verification Program. This program provides instructions for personnel when independently verifying the position or condition of designated systems or components, and calculations and data collection points. The use of independent verification reduces the likelihood of errors in plant operations.

VCSNS has established a Maintenance Second Verification Program. The purpose of this program is to verify, by a qualified person, that specific maintenance functions are performed in accordance with program requirements. Only personnel who have successfully completed the Maintenance Second Verification Training and/or persons who are ANSI 45.2.6 certified under applicable SCE&G programs, may perform this function. Maintenance Second Verifiers have direct access to the Manager, Quality Systems to assure any quality concerns receive the appropriate management attention, thereby ensuring independence from line operations.

VCSNS has implemented a proactive human performance initiative to generate awareness of plant and personnel safety in an effort to reduce human performance errors. Personnel are encouraged to act independently and to stop before performing an activity, think about the expected response, act in accordance with procedures, and review the outcome. Personnel are expected to take appropriate corrective action for activities that generate outcomes that are not expected or desired.

As part of the Fitness For Duty Rule, VCSNS has implemented a Continual Behavior Observation Program. The purpose of this program is to train personnel to independently detect personnel behavior changes that, if left unattended, could lead to acts detrimental to the health and safety of the public. The program requires all badged

personnel to be trained in detecting abnormal personnel behavior and to notify their Supervisor when it is detected.

General Employee Training (GET) is provided to all VCSNS personnel upon initial hiring and is also part of re-qualification training. GET stresses the importance for personnel to independently report unsafe activities or practices to their supervision. GET also stresses the various reporting avenues including reporting an allegation to the NRC. In addition, personnel are trained to use the corrective action program for reporting activities. The threshold for reporting at VCSNS has been set at a very low level.

VCSNS procedures require that qualified personnel assigned specific independent review responsibilities shall be independent of any direct responsibility for performance of the activities they verify and shall be trained commensurate with the scope, complexity, or special nature of the activities subject to independent review.

CONCLUSION

Because the responsibilities and qualifications specified in the VCSNS Technical Specifications for the ISEG are satisfied by the organizations listed above, there is no need to continue listing the ISEG as a separate organization in the VCSNS Technical Specifications.

Pursuant to the above information, the proposed TSCR does not involve a significant reduction in the margin of safety.

NO SIGNIFICANT HAZARDS DETERMINATION FOR REVISING SPECIFICATION 6.2.3, 6.3.1 and 6.5.2.8 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

DESCRIPTION OF AMENDMENT REQUEST

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TS 6.2.3 describes the function, composition, responsibilities, and authority of the ISEG. TS 6.3.1, in part, describes the qualification requirements of the members of the ISEG. TS 6.5.2.8 describes the requirement for the Nuclear Safety Review Committee (NSRC) to have cognizance of the audits performed by the ISEG. These Technical Specifications were implemented in response to NUREG-0737, "Clarification of TMI Action Plan Statements," which stated that each applicant for an operating license shall establish an onsite ISEG to perform independent reviews of plant operations.

The ISEG composition requirement restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public. Assigning the duties and qualifications specifically to the ISEG is not necessary because the requirements are satisfied by other aspects of the VCSNS organization. Therefore, VCSNS proposes to delete the ISEG from organizational requirements, with supporting changes to the Operations Quality Assurance Plan (OQAP). No significant hazard to the health and safety of the public is created by this change.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

South Carolina Electric & Gas Company (SCE&G) has evaluated the proposed changes to the VCSNS TS described above against the significant Hazards Criteria of 10 CFR 50.92 and has determined that the changes do not involve any significant hazard. The following is provided in support of this conclusion.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed amendment is a programmatic and administrative change to delete the ISEG. The requirement for an ISEG is located within the Administrative Section of TS (Section 6.0). The ISEG functions in an oversight role and, as such, performs no actions that would affect any precursors to any accident previously evaluated. This

change does not physically alter safety-related systems, nor does it affect the way in which safety-related systems perform their functions. However, the independent oversight functions and qualification requirements stated in TS are being performed by qualified personnel in other departments of the VCSNS organization. This assures that the functions and qualification requirements delineated for the ISEG are being met. Because the design of the facility and system operating parameters are not being changed, and the oversight functions are performed by other departments, the proposed amendment does not involve an increase in the probability or consequences of any accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed amendment to delete the ISEG is a programmatic and administrative change. There are no physical alterations to safety-related systems and no changes to the functions of any safety-related systems. The independent oversight functions assigned to the ISEG are addressed by other departments within the VCSNS organization. Personnel in those departments meet the qualifications required of the ISEG. This assures that the oversight functions and qualification requirements delineated for the ISEG are being met. Oversight functions that are performed do not in themselves lead to activities that are considered as accident precursors or initiators. Because this change does not alter the design of the facility and system operating parameters are not being changed, and the oversight functions and qualification requirements of the ISEG are being met by other departments, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in margin of safety?

The proposed amendment is a programmatic and administrative change to delete the ISEG. This proposed change involves utilizing appropriately trained and qualified personnel in other departments to perform the oversight functions previously assigned to the ISEG. No physical alterations to safety-related systems and no changes to the functions of any safety-related systems are being made. The use of personnel in other departments to perform the oversight functions of the ISEG will provide assurance that plant operations continue to be conducted in a safe manner. These oversight functions will be performed by personnel that maintain their independence from line operations. Because the design of the facility and system operating parameters are not being changed, and the oversight functions of the ISEG are appropriately addressed by other departments and will continue to be performed, the proposed amendment does not involve a significant reduction in the margin of safety.

CONCLUSION

Based on the information presented above, the proposed change does not involve a significant hazards consideration and will not have a significant effect on the safe operation of the plant as previously analyzed. Therefore, there is reasonable assurance that operation of the VCSNS in accordance with the proposed revised Technical Specifications will not endanger the public health and safety.

ENVIRONMENTAL IMPACT DETERMINATION FOR REVISING SPECIFICATIONS 6.2.3, 6.3.1 and 6.5.2.8 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

Environmental Assessment

This proposed Technical Specification change has been evaluated against criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). The following is a discussion of how the proposed Technical Specification change meets the criteria for categorical exclusion.

10 CFR 51.22(c)(9): Although the proposed change deletes the requirement for a specific independent group to perform an overview function of plant operating characteristics and design activities,

(I) the proposed change involves No Significance Hazards Consideration (refer to No Significance Hazards Evaluation);

(ii) there are no significant changes in the types or significant increase in the amounts of any effluents that may be released offsite since the proposed change does not affect the generation of any radioactive effluents nor does it affect any of the permitted release paths; and

(iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Based on the aforementioned information and pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the proposed change.

COMMITMENTS TO ASSURE INDEPENDENT VERIFICATION OF PLANT ACTIVITIES

South Carolina Electric & Gas Company (SCE&G) proposes a change to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) to delete the Independent Safety Engineering Group (ISEG).

The ISEG composition requirement restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public. Assigning the duties and qualifications specifically to the ISEG is not necessary because the requirements are satisfied by other aspects of the VCSNS organization

To assure the independent verification of plant activities identified in TS performed by the ISEG are maintained, SCE&G proposes the following:

Examine plant operating characteristics:

1. The corrective action program is used by all groups as a process for identifying, classifying, trending, reporting, and correcting situations requiring further review, evaluation, and/or action for resolution.

2. Quality Systems organization performs independent oversight activities (audits, performance monitoring, surveillance, assessments, and evaluations) during refueling outages, startup activities, and normal and off-normal operational activities.

3. Quality Systems performs surveillance activities to verify conformance with specified requirements and industry good practices, and to evaluate their adequacy and effectiveness.

4. Plant Support Engineering has primary responsibility for implementing the Maintenance Rule Program, which ensures compliance with 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Under this program, the effectiveness of maintenance activities for risk significant plant equipment is monitored in order to minimize the likelihood of failures and events.

5. Probabilistic Safety Assessment Group monitors plant performance and operating characteristics in the VCSNS Probabilistic Risk Assessment and provides risk insights to the rest of the plant.

Examine NRC issuances, industry advisories and Licensee Event Reports:

1. Nuclear Licensing and Operating Experience (NL&OE) Group will review NRC issuances and industry advisories for review of information on plant design and operating experience.

2. NL&OE personnel develop Licensee Event Reports pursuant to 10 CFR 50.73 as applicable following review of conditions potentially adverse to quality which are reportable.

3. NL&OE personnel routinely review industry plant status reports (including LERs) for information applicable to VCSNS.

Review of other appropriate sources of plant design and operating experience information:

1. NL&OE personnel review plant design and operating experience information provided from other sources and disseminate it to site organizations for review and/or action, as appropriate.

Make detailed recommendations for procedure revisions, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the General Manager, Nuclear Safety.

1. Quality Systems personnel provide recommendations to the General Manager, Nuclear Support Services as a result of independent oversight activities performed.

2. Other VCSNS organizations provide recommendations through their management chain as a result of review and oversight activities performed.