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September 20, 2001
RC-01-0166

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

Attention: Mr. R. R. Assa

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
TECHNICAL SPECIFICATION AMENDMENT REQUEST TSP 00-0032
REVISION TO ENGINEERED SAFETY FEATURE ACTUATION SYSTEM
INSTRUMENTATION TABLES - RESPONSE TO QUESTIONS DATED
JULY 30, 2001

Reference: Letter, Stephen A. Byrne to Document Control Desk, dated December 28, 2000,
RC-00-0376

Per a telephone conference with the NRC Project Manager and technical reviewer on July 30, 2001, South Carolina Electric & Gas Company (SCE&G) submits the attached responses to assist in the review of this requested Technical Specification change.

A copy of this application and associated attachments is being provided to the designated South Carolina State official in accordance with 10 CFR 50.91.

Should you have questions, please call Mr. Philip A. Rose at (803) 345-4052.

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

Very truly yours,

Stephen A. Byrne

PAR/SAB/dr
Attachment

A001

c: N. O. Lorick
N. S. Carns
T. G. Eppink (w/o Attachment)
R. J. White
L. A. Reyes
NRC Resident Inspector
P. Ledbetter
K. M. Sutton
T. P. O'Kelley
W. R. Higgins
RTS (TSP 00-0032)
File (813.20)
DMS (RC-01-0166)

STATE OF SOUTH CAROLINA :
:
COUNTY OF FAIRFIELD :

TO WIT :

I hereby certify that on the 20th day of September 2001, 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 Senior 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 to the best of his knowledge, information, and belief, 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 26, 2005

Date

Response to Questions asked on July 30, 2001

- 1. The licensee stated that some of the proposed changes conform to WCAP 14333-P-A. As stated in the safety evaluation of the WCAP 14333-P-A, the licensee should confirm the applicability of the WCAP 14333-P-A for their plant.**

The guidance in WCAP 14333-P-A is applicable to the Virgil C. Summer Nuclear Station (VCSNS). VCSNS has two 120 VAC buses which supply vital power for the safety-related instrumentation loops (four channels). Normal power supply to these instrument buses is 480 VAC stepped down and rectified, with the two station batteries as almost instantaneous backup, through safety-related inverters and static switches. An alternate supply for these vital instrument buses is 120 VAC from safety-related buses through the same static switches.

The Engineered Safeguard Features Actuation System (ESFAS) Functions with the bypass allowance are the three energize-to-actuate functions: Containment Spray actuation on High-3, Emergency Feedwater Pump suction transfer on low suction pressure, and ECCS pump suction transfer to containment sump on low-low level in the Refueling Water Storage Tank (RWST). These channels were designed to be energize-to-actuate to protect the plant from inadvertent actuation on loss of power.

WCAP 14333-P-A, in response to RAI number 3 (asked during the WCAP review process), states that the plant data provided in the WCAP 14333-P-A is representative of the operation of all Westinghouse plants. The impact of the type of NSSS, plant vintage and age, number of units and performance has been incorporated into the analysis performed to permit relaxation of Allowed Outage Times (AOT).

Guidance in WCAP 14333-P-A states that if the function was not generically evaluated in WCAP 10271, a plant specific evaluation of those functions must be performed. WCAP 10271-P-A performed a generic evaluation for Condition E (Containment Spray on High-3). Conditions F and K (Emergency Feedwater suction transfer on low suction pressure and ECCS pump suction transfer on RWST low-low level respectively) were not generically evaluated. This plant specific evaluation for extending the Allowed Outage Time (AOT) for placing the energized to operate channels in bypass was performed for Licensee Event Report (LER) 50-395 2000-004-00. The conclusion of this evaluation is that there is no significant impact to plant safety or the health or safety of the public by having the channels in bypass for greater than 72 hours.

2. Specify the time duration after the statement “place the affected channel in trip within the following hour”.

Proposed Action Statement 16 to Table 3.3-3 states to restore the inoperable channel to OPERABLE status within 72 hours otherwise;

Place the affected channel in trip within the following hour

Or

Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

This action statement allows 72 hours for a channel to remain in bypass, 73 hours to place the channel in trip or 78 hours to place the unit in HOT STANDBY (108 hours to place the unit in COLD SHUTDOWN). The terminology used is consistent with that in NUREG 0452 and identical to that in our current Technical Specifications. This terminology is understood by the VCSNS Operations staff and is reinforced during periodic training. The addition of the action times is performed by the user and is currently not a workaround or source of confusion.

NUREG 1431, Revision 2, provides the completion times in an additive format. This terminology may be less confusing to those trained to the Improved Technical Specifications, but the insertion of this style into this Action Statement would not be consistent with the other Action Statements in this Specification.