



January 9, 2002
RC-02-0002

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
TECHNICAL SPECIFICATION AMENDMENT REQUEST - TSP 00-0032
REVISION TO ENGINEERED SAFETY FEATURE ACTUATION SYSTEM
INSTRUMENTATION TABLES - SUPPLEMENTAL LETTER

Reference: 1. S. A. Byrne to Document Control Desk, RC-00-0376, Dated December 28, 2000
2. Licensee Event Report (LER) 50/395 2000-004-00

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby submits a response to your verbal request for additional information concerning the above referenced amendment request. This amendment request was for the V. C. Summer Technical Specifications (TS), Specification 3/4.3.2, Tables 3.3-2, 3.3-3, and 3.3-4.

As a result of discussions conducted on December 5th and 7th between the NRC and SCE&G, we would like to state unequivocally that the requested Allowed Outage Time (AOT) is not based on any risk informed methodologies.

Table 3.3-3, Functional Units 2.c, 3.b.2, 6.h, and 8.a, all reference Action 16. Action 16 allows these channels to be placed into a bypassed condition for an indefinite period of time. A single failure vulnerability was discovered which could prevent the automatic initiation of these functions if a channel is already bypassed. This was identified in the referenced LER. Corrective action for this condition includes the amendment request referenced above.

A 72-hour allowed outage time (AOT) has been proposed in the amendment request where none was specified previously. The AOT was chosen to be no more restricting than existing AOTs for the ECCS and Emergency Diesel Generator. Although the condition could preclude an automatic actuation of the identified functions, manual actuation can be achieved from the control room. Steps in the Emergency Operating Procedures direct the control board operators to assure that specific actuations are complete, by verification of the actuation or performing manual initiation.

ADD 1

Additionally, a sensitivity study was performed on site, based on our current PRA model (CAFTA), which has indicated that there is negligible safety significance even if the channel(s) was permitted to remain bypassed for one year. This conclusion was reported in LER 50/395 2000-004-00.

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

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

Very truly yours,



Stephen A. Byrne

PAR/SAB/dr

c: N. O. Lorick
N. S. Carns
T. G. Eppink
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RTS (0-L-00-0032)
File (813.20)
DMS (RC-02-0002)

STATE OF SOUTH CAROLINA :
COUNTY OF FAIRFIELD :

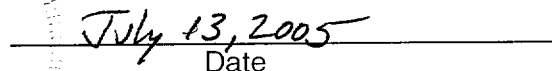
TO WIT :

I hereby certify that on the 9th day of JANUARY 2002, 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


Date