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SCE&G®
A SCANA COMPANY

May 21, 2003
RC-03-0109

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

Attention: Ms. K. R. Cotton

Ladies and Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
TECHNICAL SPECIFICATION AMENDMENT REQUEST TSP 01-0235
REVISION TO EMERGENCY DIESEL GENERATOR START TIME SURVEILLANCE REQUIREMENT, RESPONSE FOR REQUEST FOR ADDITIONAL INFORMATION
(TAC NO. MB6521)

Reference: Mr. Stephen A. Byrne, SCE&G, Letter (RC-02-0147) to the Document Control Desk dated September 24, 2002

Mr. Stephen A. Byrne, SCE&G, Letter (RC-03-0085) to the Document Control Desk dated April 8, 2003

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby provides a response to a request for additional information related to the above referenced request for an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS). These questions were asked during phone conferences conducted on December 19, 2002, and April 3, 2003, and pertained to the proposed changes in Emergency Diesel Generator fuel oil testing.

Question #1

In regards to the proposed change to eliminate the words "with proper color" from Surveillance Requirement 4.8.1.1.2.d.1.d, what activities are we planning to perform to assure the fuel oil meets the ASTM standard requirements for contamination?

VCSNS has been performing the clear and bright surveillance when unloading the fuel tanker, however, with the addition of dye to the fuel oil the term "with proper color" is confusing and could cause an unsatisfactory surveillance if verbatim compliance is required. Additionally, VCSNS has been performing the water and sediment analysis on the fuel oil, prior to unloading

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the tanker that meets the requirements of ASTM Standard D-1796. This testing consists of the initial four tests of the standard.

Question #2

In regards to the proposed change to revise the words "in accordance with" to "based on", what specific exemptions from the methodologies and tests specified in the applicable ASTM Standards are we planning to take?

The following are examples of the proposed exceptions to the ASTM standards associated with the testing of Diesel Fuel Oil at the VCSNS.

a. The sample containers used for sampling fuel oil using the ASTM D2276-88 method will not have a clean piece of plastic film rinsed with filtered petroleum ether placed over the top of the bottle.

Basis: The plastic film is to prevent dust from entering the sample, typically on field samples. All analyses are in a laboratory environment where cleanliness is maintained. Plant procedures provide guidance for cleaning containers and equipment.

b. Filtered petroleum ether or filtered 1,1,2-trichloro-1,2,2-trifluoroethane used in the ASTM D2276-88 method may be substituted with unfiltered 1,1,2-trichloro-1,2,2-trifluoroethane, n-Hexane or Isooctane.

Basis: Petroleum ether is a hazardous chemical. 1,1,2-trichloro-1,2,2-trifluoroethane has been determined to be detrimental to the ozone layer of the earth's atmosphere and is being phased out of circulation. N-Hexane or Isooctane are suitable replacements for these chemicals. These chemicals are purchased as ACS Reagent Grade and do not require filtration.

c. The viscometer bath temperature will be allowed a 0.05° C variation during the performance of Kinematic Viscosity, ASTM D445.

Basis: The cycle range of the viscosity baths would be +/- 0.05° C, with this request. This slight variance has been determined not to significantly affect analytical results of diesel fuel oil analyses.

d. An alternate thermometer that meets the accuracy requirements of specified ASTM thermometers may be used during the analysis of diesel fuel oils.

Basis: Alternate thermometers that meet the stated ranges and accuracy requirements would still be used. The thermometers will be calibrated in the same manner as the ASTM thermometers. If an ASTM thermometer is unavailable, an alternate calibrated thermometer with the same specifications should be allowed.

e. The determination of Flash Point in oil testing analysis results will not be corrected for barometric pressure.

Basis: Historical data proves this correction does not add value for this location. Climate conditions for this area and laboratory controls, render this requirement to be insignificant in determining the actual value of the flash point.

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.

May 21st 2003
Executed On

Stephen A. Byrne for SAB

PAR/SAB

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