

Stephen A. Byrne  
Senior Vice President, Nuclear Operations  
803.345.4622



June 29, 2004

Mr. W. D. Travers  
Regional Administrator  
U.S. NRC Region II  
Sam Nunn Atlanta Federal Center, 23 T85  
61 Forsyth Street, SW  
Atlanta, GA 30303-8931

Dear Mr. Travers:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
SPECIAL REPORT 2004-001

South Carolina Electric & Gas Company (SCE&G) is submitting this written follow-up report pursuant to the requirements of Operating License Condition 2.G(1), Reporting to the Commission. The initial verbal report was provided on June 22, 2004 at approximately 0915 hours.

Operating License Condition 2.C(18) requires that VCSNS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report. On June 21, 2004, at approximately 1600 hours, it was determined that there was a discrepancy between actual plant equipment and that as described in the Fire Protection Evaluation Report (FPER). Section 5.D.4(c) of the FPER states that portable smoke ejectors are available which are capable of operation with the loss of offsite power. Contrary to this position it was noted that the portable smoke ejectors were electrically powered units.

This condition has been entered in the station's corrective action program (Condition Event Report 0-C-04-1335). Additional detail of the condition as well as the corrective action is presented in the attachment to this letter.

Should you have any questions, please call Mr. Ronald B. Clary at (803) 345-4757 at your convenience.

Very truly yours,

Stephen A. Byrne

PAR/SAB/mb  
Attachment

c: N. O. Lorick  
N. S. Carns  
T. G. Eppink  
R. J. White  
K. R. Cotton  
K. M. Sutton  
NRC Resident inspector

K. D. Landis  
INPO Records Center  
NSRC  
RTS (0-C-04-1935)  
File (818.08)  
BMS (RC-04-0104)

Attachment  
Mr. W. D. Travers  
RC-04-0104  
O-C-04-1935

During the Triennial Fire Protection inspection, one of the NRG inspectors questioned how the commitment to have portable smoke ejectors capable of operating during a loss of offsite power (reference Fire Protection Evaluation Report (FPER) section 5.B.4(c)) was satisfied using electrically powered smoke ejectors. Condition Evaluation Report (CER) 04-1935 was generated to identify the issue and track it to resolution.

The original smoke ejector equipment consisted of gasoline-powered units. This equipment was operated on an infrequent basis, and was difficult to maintain in a reliable condition. In 1997 a change to Fire Protection Procedure (FPP-026) was initiated to replace the gasoline-powered units with electrically powered ones. A 10 GFR 50.59 screening was performed for the procedure change, but the performer failed to identify, address, and resolve the equipment functional requirements described in section 5.D.4(c) of the FPER. Therefore, it was determined on 6/22/2004, that SCE&G did not meet the specified FPER program position to have portable ejectors capable of operation with loss of offsite power.

Since the verbal notification was made, SCE&G has performed a review of the design and licensing basis requirements for the smoke ejectors. The purpose of the smoke ejectors is to rapidly remove smoke associated with a fire to assist in the overall fire fighting and post-fire recovery activities. While the VCSNS FPER acknowledges the existence of this tool, use of these ejectors is not specifically credited within the analyses. In the case of a fire that produces excessive smoke, use of the ejectors would help to improve the total firefighting time and subsequent recovery activities by reducing the amount of smoke in the area. This could in turn improve the overall efficiency of the fire fighting activities.

Corrective actions have been implemented to bring the plant back into compliance with the approved FPER position. Generators have been provided for use with the smoke ejectors to allow for operation of the equipment in the event of a loss of offsite power. These generators are dedicated for Fire Brigade use only and will be available as necessary to support the smoke ejectors if needed during a loss of offsite power.