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June 20, 1986

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
Operating License No. NPF-12  
Administrative Technical  
Specification Changes

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) hereby requests that the enclosed changes be made to the Virgil C. Summer Nuclear Station Technical Specifications (See Attachments A-D). These changes, as described in the following paragraphs, are administrative in nature and are being requested in order to ensure the Technical Specifications are maintained in an optimum readable and usable condition.

With the issuance of Amendment 44 to the Technical Specifications, the information in the old section 3/4.5.4, "Boron Injection Tank," was deleted and replaced with the information that was on page 3/4.5-11, section 3/4.5.5, "Refueling Water Storage Tank (RWST)". However, in amending this material, the paragraph numbering on the RWST information was not changed to correspond to the new section number (3/4.5.4). Therefore, SCE&G proposes the numbering be changed as shown on Attachment A to provide for consistency within this Technical Specification.

As a result of an internal review, SCE&G identified portions of the Technical Specifications dealing with radiation monitors which needed clarification. As identified in Tables 4.3-8 and 4.3-9, an analog channel operational test is required of effluent monitoring instrumentation. Notes contained in the tables (See existing Notes 1 and 5 on page 3/4.3-72 and Note 1 on page 3/4.3-79) pertaining to certain monitors indicate that this test shall also demonstrate that automatic isolation of the pathway and control room alarm annunciation occurs if certain conditions exist. One of these conditions (existing Item 4 of the notes) is the instrument controls not set in the operate mode. SCE&G's position has always been that when those radiation monitors

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to which the notes apply are placed in the bypass position (via the Normal/Bypass switch) for the performance of a test procedure, the monitors are considered inoperable and the applicable action statement is applied. The purpose and incorporation of the Normal/Bypass switch in the original design of the systems was to defeat the interlock function during calibration and maintenance to allow implementation of action statements without the need to temporarily lift leads and/or install jumpers. Therefore, the Normal/Bypass switch is not considered to be one of the instrument controls as stated in existing Item 4 of the notes. A second condition, loss of flow or low flow will also initiate an alarm. To describe existing system function the low flow (alarm only) and Normal/Bypass switch set in Bypass (alarm only) items should be added to existing Notes 1 and 5 on page 3/4 3-72 and to existing Note 1 on page 3/4 3-79. In addition the low flow item should be added to Note 2 on page 3/4 3-79. Table 4.3-8 does not reference Note 2 on page 3/4.3-72 therefore Note 2 on page 3/4.3-72 should be deleted and existing Notes 3, 4 and 5 be renumbered 2, 3 and 4 respectively. In order to provide clarification and prevent any interpretation problems in the future, SCE&G requests that the Technical Specification be revised as indicated in Attachment B.

In a review of Table 3.3-3, 3.3-4, 3.3-5 and 4.3-2, inconsistencies in terminology were discovered in three instances.<sup>1</sup> These inconsistencies deal with line items containing terms such as "High-High" or "High 2" that are identified in each of the four tables. Therefore, SCE&G proposes the items be termed as identified on the marked-up Technical Specification pages found in Attachment C. Note that for item 2.C in Table 4.3-2 on page 3/4.3-35, the correct term should be "Reactor Building Pressure - High 3" as opposed to the presently stated "3". This terminology agrees with the corresponding items found in Tables 3.3-3, 3.3-4 and 3.3-5, and identifies the correct actuation signal for Reactor Building Pressure.

Attachment D represents typographical corrections only to section 3/4.2.4.

Based on the administrative and clarifying nature of these changes, and having compared these changes with the criteria of 10CFR50.92, SCE&G has determined that the proposed amendments involve no significant hazards consideration. Neither operation of the Virgil C. Summer Nuclear Station nor its design will be changed due to the proposed amendments.

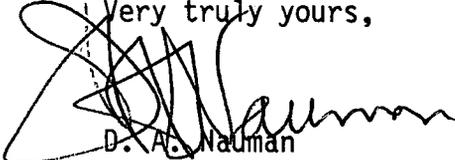
1 Rubenstein (NRC) letter to Nauman (SCE&G), May 16, 1986, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 49 to Facility Operating License NPF-12"

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Also, we note that these changes are similar to the examples of most likely no significant hazards presented in the NRC's "Standards for Determining Whether License Amendments Involve No Significant Hazards Consideration."<sup>2</sup>

These changes to the Technical Specification have been reviewed and approved by both the Plant Safety Review Committee and the Nuclear Safety Review Committee. Please find enclosed the application fee of \$150.00 required by 10 CFR 170.

I declare the statements and matters set forth herein are true and correct to the best of my knowledge, information and belief. If you should have any questions, please contact me at your convenience.

Very truly yours,  
  
D. A. Nauman

Enclosures

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