



August 23, 2011
RC-11-0063

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

Attn: R.E. Martin

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST – LAR 11-01774
Application to Eliminate License Condition 2.G.1 Requiring Reporting of
Violations of Section 2.C of the Operating License Using the Consolidated
Line Item Improvement Process (CLIIP)

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, is submitting a request for an amendment to the operating license for Virgil C. Summer Nuclear Station (VCSNS) Unit 1.

The proposed amendment would delete the license condition that requires reporting of violations of other requirements (e.g., conditions listed in Section 2.C) in the operating license. The change is consistent with the notice published in the *Federal Register* on November 4, 2005 (70 FR 67202) as part of the consolidated line item improvement process (CLIIP).

Attachment I contains SCE&G's evaluation of the proposed change, including a description of the proposed change and confirmation of applicability. Attachment II provides a mark-up of the operating license and technical specification (TS) pages showing the proposed changes. Attachment III provides the retyped operating license and TS pages. Attachment IV provides a summary of the regulatory commitments made in this submittal.

SCE&G requests approval of the proposed license amendment by June 3, 2012 with the amendment being implemented within 120 days.

This proposed change has been reviewed and approved by both the VCSNS Plant Safety Review Committee (PSRC) and the VCSNS Nuclear Safety Review Committee (NSRC).

In accordance with 10 CFR 50.91(b)(1), "State Consultation," a copy of this application, with attachments, is being provided to the designated South Carolina Official.

The NRC has allowed the elimination of license conditions requiring reporting of violations of other requirements in the operating license for Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 (ML082260124), and Seabrook Station (ML060870115).

A001
NRR

If you should have any questions about this submittal, please contact Mr. Bruce L. Thompson at (803) 931-5042.

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

8-23-2011
Executed on


Thomas D. Gatlin

JMW/TDG/gr

Attachments: 4

- I. Evaluation of Proposed Changes
- II. Proposed Changes - Marked-up Pages
- III. Proposed Technical Specification Pages (Retyped)
- IV. List of Regulatory Commitments

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**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12**

ATTACHMENT I

EVALUATION OF PROPOSED CHANGES

1.0 INTRODUCTION

The proposed amendment would delete License Condition 2.G.1 of Facility Operating License No. NPF-12 for the Virgil C. Summer Nuclear Station (VCSNS), Unit 1, which requires reporting of violations of the requirements in Section 2.C of the facility operating license. The availability of this operating license improvement was announced in the *Federal Register* on November 4, 2005 (70 FR 67202) as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the CLIIP Notice of Availability (70 FR 67202), the proposed amendment consists of deleting Section 2.G.1 of Facility Operating License NPF-12. The current requirements of the license condition are as follows:

G. Reporting to the Commission:

- (1) SCE&G shall report any violations of the requirements contained in Section 2, items C(1), C(3) through (33), E, F, K, and L of this renewed license within twenty-four (24) hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region II, or designee, not later than the first working day following the violation, with a written follow up report within fourteen (14) working days.

The existing conditions in Section 2.C that are subject to the current reporting requirement consist of the following:

(1) Maximum Power Level

SCE&G is authorized to operate the facility at reactor core power levels not in excess of 2900 megawatts thermal in accordance with the conditions specified herein and in Attachment 1 to this renewed license. The preoperational tests, startup tests and other items identified in Attachment 1 to this renewed license shall be completed as specified. Attachment 1 is hereby incorporated into this license.

(3) Conduct of Work Activities During Fuel Load and Initial Startup

SCE&G shall review by committee all facility construction, preoperational testing, and system demonstration activities performed concurrently with facility initial fuel loading or with the facility startup test program to assure that the activity will not affect the safe performance of the facility fuel loading or the portion of the facility startup program being performed. The review shall address, as a minimum, system interaction, span of control, staffing, security, and health physics, with respect to the performance of the activity concurrently with the facility fuel loading or the portion of the facility startup program being performed. The committee for the review shall be composed of at least three members, knowledgeable in the above areas, and who meet the qualifications for professional-technical personnel specified by Section 4.4 of ANSI N18.7-1971. At least one of these three shall be a senior member of the Plant Managers staff.

(4) Initial Test Program

SCE&G shall conduct the post-fuel-loading initial test program set forth in Chapter 14 of the Final Safety Analysis Report, as amended through No. 33, without making any major modifications to this program unless such modifications have been identified and have received prior NRC staff approval. Major modifications are defined as:

- a. Elimination of any test other than those identified as non-essential in Chapter 14 of SCE&G's Final Safety Analysis Report, as amended through Amendment No. 33,
- b. Modifications of test objectives, methods or acceptance criteria for any test other than those identified as non-essential in Chapter 14 of SCE&G's Final Safety Analysis Report, as amended through Amendment No. 33,
- c. Performance of any test at a power level different from the power level indicated in the described program; and
- d. Failure to complete any tests included in the described program (planned or scheduled for power levels up to the authorized power level).

For the performance of startup testing as described in Table 14.1-75 of the Final Safety Analysis Report, as amended through Amendment No. 33, compliance with items 3 and 4 of Table 3.3-1 of the Technical Specifications is not required.

(5) Stability of the West Embankment and its Effects on the Intake Structure
(Section 2.5.4, SSER 3)

SCE&G shall conduct the monitoring program discussed in Section 2.5.4.10.6.2 of the Final Safety Analysis Report, as amended through Amendment No. 33, to specifically include the following:

- a. At the vicinity of the pumphouse and intake structure, four settlement points capable of monitoring both horizontal and vertical movements shall be established to monitor the embankment movements.
- b. The submerged slope profile of the west embankment over the intake structure shall be established and monitored to detect any unusual movements that may affect the intake structure.
- c. The schedule and the reporting requirements of the above inspection shall be in accordance with the recommendations stated in Regulatory Guide 1.127.
- d. The condition of the intake structure shall be monitored to detect new cracks and changes to the old grouted or ungrouted cracks. Observed changes (length or width) in existing cracks and any new cracks shall be reported by SCE&G to the NRC staff. The maximum inspection interval for this monitoring of the intake structure is five (5) years.
- e. The condition of the intake structure shall also be monitored as specified in (d.) above following any earthquake during which the plant seismic instrumentation indicates that the operating basis earthquake has been exceeded.

(6) Design Verification Program (Section 3.7.4, SSER #5)

Prior to December 31, 1982 SCE&G shall provide a final report to the NRC staff delineating the final resolution of the actions taken to satisfy the recommendations of the independent design verification conducted by Stone & Webster Engineering Corporation.

(7) Thermal Sleeves (Section 3.9.3, SSER #5)

Prior to startup after the first refueling outage, SCE&G shall provide, for NRC staff review and approval, justification for continued operation with the thermal sleeves removed from selected nozzles in the reactor coolant system.

(8) Environmental Qualification of Mechanical and Electrical Equipment (Section 3.11, SSER 4)

- a. SCE&G shall complete all actions related to environmental

qualification of equipment on a schedule specified in Section 3.11 of Supplement 4 to the Safety Evaluation Report.

- b. Complete and audible records shall be available and maintained at a central location by SCE&G. Such records shall describe the environmental qualification methods used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," Revision 1, dated July 1981. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified to document compliance with NUREG-0588.
- c. Prior to startup after the first major shutdown or refueling outage after June 1983, SCE&G shall be in compliance with the provisions of NUREG-0588 for safety-related electrical equipment exposed to a harsh environment.

(9) Mechanical Performance (Section 4.2.3, SER)

Prior to startup after the first refueling outage, SCE&G shall examine fuel rods for baffle-jetting failure as specified in Section 4.2.3 of the Safety Evaluation Report. Should damage be observed at that time, a corrective action plan shall be submitted to the NRC staff for review and approval.

(10) Overpressurization Protection (Section 5.2.2, SSER 4)

Prior to startup after the first refueling outage, SCE&G shall install an NRC staff-approved low-temperature overpressurization protection system. The preliminary design shall be provided for NRC staff review not later than June 30, 1983.

(11) Inservice Inspection and Testing (Section 5.2.4, SSER 3)

SCE&G shall perform the following actions in conjunction with the first inservice examination:

- a. Demonstrate the ability of the ultrasonic examination procedure to detect actual flaws and/or artificial reflectors in the volume subject to examination to the acceptance standards of Paragraph IWB-3500 in weldments representative of the design and materials of construction.
- b. in the event that one-third thickness semi-circular reference flaws cannot be detected and discriminated from inherent anomalies, the entire volume of the weld shall be examined during the inservice inspection.

- c. The reporting of the inservice inspection examination results shall be documented in a manner to define qualitatively whether, the weldment and the heat affected zone and adjacent base metal on both sides of the weld were examined by ultrasonic angle beam techniques.

(12) Design Description -Control (Section 4.3.2, SER)

SCE&G is prohibited from using part-length rods during power operation.

(13) Deleted

(14) Deleted

(15) Deleted

(16) Cable Tray Separation (Section 8.3.3, SSER 4)

Prior to startup after the first refueling outage, SCE&G shall implement the modifications to the cable trays discussed in Section 8.3.3 of Supplement No. 4 to the Safety Evaluation Report or demonstrate to the NRC staff that faults induced in non-class 1E cable trays will not result in failure of cable in the adjacent Class 1E cable trays.

(17) Alternate Shutdown System (Section 9.5.1, SSER 4)

Prior to startup after the first refueling outage, SCE&G shall install a source range neutron flux monitor independent of the control complex as part of the alternate shutdown system.

(18) Fire Protection System (Section 9.5.1, SSER 4)

Virgil C. Summer Nuclear Station shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, and as approved in the Safety Evaluation Report (SER) dated February 1981 (and Supplements dated January 1982 and August 1982) and Safety Evaluations dated May 22, 1986, November 26, 1986, and July 27, 1987 subject to the following provisions:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of fire.

(19) Instrument and Control Vibration Tests for Emergency Diesel Engine

Auxiliary Support Systems (Section 9.5.4, SER)

Prior to startup after the first refueling outage, SCE&G shall either provide test results and results of analyses to the NRC staff for review and approval which validate that the skid-mounted control panels and mounted equipment have been developed, tested, and qualified for operation under severe vibrational stresses encountered during diesel engine operation, or SCE&G shall floor mount the control panels presently furnished with the diesel generators separate from the skid on a vibration-free floor area.

(20) Solid Radioactive Waste Treatment System (Section 11.2.3, SSER 4)

SCE&G shall not ship "wet" solid wastes from the facility until the NRC staff has reviewed and approved the process control program for the cement solidification system.

(21) Process and Effluent Radiological Monitoring and Sampling Systems (Section 11.3, SSER 4)

Prior to startup after the first refueling outage, SCE&G shall install and calibrate the condensate demineralizer backwash effluent monitor RM-L11.

(22) Core Reactivity Insertion Events (Section 15.2.4, SSER 4)

For operations above 90% of full power, SCE&G shall control the reactor manually or the rods shall be out greater than 215 steps until written approval is received from the NRC staff authorizing removal of this restriction.

(23) NUREG-0737 Conditions (Section 22)

SCE&G shall complete the following conditions to the satisfaction of the NRC staff. Each item references the related subpart of Section 22 of the SER and/or its supplements.

a. Procedures for Transients and Accidents (I.C.1, SSER 4)

Prior to startup after the first refueling outage, SCE&G shall implement emergency operating procedures based on guidelines approved by the NRC staff.

b. Special Low Power Testing and Training (I.G.1, SSER 4)

Within twelve months following completion of the startup test program, SCE&G shall provide a report describing the results of a comparison of actual plant data taken during the natural

circulation test program to the simulator responses described in the SCE&G letter, T. C. Nichols, Jr. to H. R. Denton dated March 31, 1982.

c. Direct Indication of Safety Valve Position (II.D.3, SSER 4)

Prior to exceeding 5 percent of full power, the safety valve position indication system shall be seismically qualified by SCE&G consistent with the component or system to which it is attached, and documentation of this shall be provided to the NRC staff for review and approval.

d. Inadequate Core Cooling Instruments (II.F.2, SSER 4)

Prior to startup after the first major shutdown or refueling outage after June 30, 1983, SCE&G shall complete upgrading of the incore thermocouple wiring and qualification of isolators, reference junction boxes and connectors.

e. Plant-Specific Calculations for Compliance with 10 CFR Section 50.46 (II.K.3.31, SSER 1)

Within one year after model revisions are approved by the NRC staff, SCE&G shall provide a supplemental plant-specific analysis to verify compliance with 10 CFR 50.46, using the revised models developed under item II.K.3.30 of NUREG-0737.

f. Upgrade Emergency Support Facilities (III.A.1.2, SSER 4)

SCE&G shall complete its emergency response facilities as follows:

- (i) Safety parameter display system - April 1, 1983
- (ii) Emergency operations facility - April 1, 1983
- (iii) Technical support center - April 1, 1983

(24) Deleted

(25) Confirmatory Seismic Analysis (ASLB Partial Initial Decision, July 20, 1982, Section VI.2)

During the first year of operation, SCE&G shall successfully complete the confirmatory program on plant equipment and components within the guidelines established in the findings contained in the ASLB Partial Initial Decision dated July 20, 1982, to demonstrate to the NRC staff's satisfaction that explicit safety margins exist for each component necessary for shutdown and continued heat removal in the event of the maximum potential shallow earthquake.

- (26) Plume Exposure Emergency Planning Zone (ASLB Supplemental Partial Initial Decision, August 4, 1982, Section VIII.3)

During the first year of operation, SCE&G shall assure that the plume exposure emergency planning zone has been expanded to include the Kelly Miller, Greenbriar Headstart and Chapin Elementary schools and the emergency evacuation plans have been adjusted accordingly.

- (27) Transportation Planning (ASLB Supplemental Partial Initial Decision, August 4, 1982, Section VIII.4)

During the first year of operation, SCE&G shall assure that the defects in transportation planning discussed in Finding 24 of the ASLB Supplemental Partial Initial Decision dated August 4, 1982 have been remedied.

- (28) Food Pathway Contamination (ASLB Supplemental Partial Initial Decision, August 4, 1982, Section VIII.6)

During the first year of operation, SCE&G shall assure that plans to implement remedial and preventive measures for consumer protection against food pathway contamination have been formulated and communicated to the agricultural community.

- (29) Siren Alerting System (ASLB Supplemental Partial Initial Decision, August 4, 1982, Section VIII.7)

Prior to exceeding 5% of full power, SCE&G shall complete installation and satisfactory testing of its siren alerting system.

- (30) Emergency Facilities and Staffing (ASLB Supplemental Partial Initial Decision, August 4, 1982, Section VIII.8)

SCE&G shall complete the following three items related to emergency preparedness to the satisfaction of the NRC staff, consistent with the Supplement No. 2 to the Safety Evaluation Report, page A-13:

- (i) Minimum shift manning requirements
- (ii) Emergency response facilities
- (iii) Meteorological and dose assessment capability

- (31) Final NRC Approval of Emergency Preparedness (ASLB Supplemental Partial Initial Decision, August 4, 1982, Section VIII.9)

Prior to exceeding 5% of full power, final NRC staff approval of the state of emergency preparedness for the Virgil C. Summer Nuclear Station site shall be required.

(32) Deleted

(33) Emergency Preparedness Exercise (Section 13.3, SSER #5)

Prior to March 31, 1983, SCE&G shall conduct an emergency exercise similar to that conducted on May 5, 1982 but which includes full participation of the local governments and partial State participation.

E. SCE&G shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Virgil C. Summer Nuclear Station Security Plan," as updated through May 15, 2006. This document includes the Security Training and Qualification Plan as Appendix B and the Safeguards Contingency Plan as Appendix C.

F. This renewed license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE&G shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

K. Updated Final Safety Analysis Report

The South Carolina Electric & Gas Company Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The South Carolina Electric & Gas Company shall complete these activities no later than August 6, 2022, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

The Updated Final Safety Analysis Report supplement, as revised, shall be included in the next scheduled update to the Updated Final Safety Analysis Report required by 10 CFR 50.71 (e)(4) following issuance of this renewed license. Until that update is complete, the South Carolina Electric & Gas Company may make changes to the programs and activities described in the supplement without prior Commission approval, provided that the South Carolina Electric & Gas Company evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

- L. All capsules in the reactor vessel that are removed and tested must meet the test procedures and reporting requirements of ASTM E 185-82 to the extent practicable for the configuration of the specimens in the capsule. Any changes to the capsule withdrawal schedule, including spare capsules, must be approved by the NRC prior to implementation. All capsules placed in storage must be maintained for future insertion. Any changes to storage requirements must be approved by the NRC.

The reporting requirement defined in Technical Specification (TS) 6.6 for VCSNS requires a report to the NRC for reportable events related to 10 CFR 50.72 and 50.73. As discussed in the Federal Register notices associated with the use of the CLIIP to remove the reporting requirements of Section 2.G.1 of the facility operating license, this application also includes the deletion of TS 6.6.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on November 4, 2005 (70 FR 67202) and the Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on November 4, 2005 (70 FR 67202) and the Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

5.0 TECHNICAL ANALYSIS

SCE&G has reviewed the safety evaluation (SE) published on August 29, 2005, as part of the CLIIP Notice of Opportunity to Comment. SCE&G has concluded that the justifications presented in the SE prepared by the NRC staff are applicable to Virgil C. Summer Nuclear Station (VCSNS) and justify this amendment of the facility operating license and TS 6.6 for VCSNS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

SCE&G has reviewed the proposed no significant hazards consideration determination published on August 29, 2005 (70 FR 51098), as part of the CLIIP Notice of Opportunity to Comment. SCE&G has concluded that the proposed determination presented in the notice is applicable to VCSNS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL CONSIDERATION

SCE&G has reviewed the environmental evaluation included in the model SE published on August 29, 2005 (70 FR 51098), as part of the CLIIP Notice of Opportunity to Comment. SCE&G has concluded that the NRC staff's findings presented in that evaluation are applicable to VCSNS and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. SCE&G is not proposing variations or deviations from the changes described in the NRC staff's model SE published August 29, 2005 (70 FR 51098).

10.0 REFERENCES

1. *Federal Register* Notice of Opportunity to Comment on Model Safety Evaluation on Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process, August 29, 2005 (70 FR 51098) [ML052350500].
2. *Federal Register* Notice of Availability of Model Application Concerning Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process, November 4, 2005 (70 FR 67202).

**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12**

ATTACHMENT II

PROPOSED CHANGES – MARKED-UP PAGES

**Attachment to License Amendment No. XXX
To Facility Operating License No. NPF-12
Docket No. 50-395**

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

OL Page 12

Index XIX

6-10

Insert Pages

OL Page 12

Index XIX

6-10

- F. This renewed license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE&G shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

- G. Reporting to the Commission:

DELETED

- (1) ~~SCE&G shall report any violations of the requirements contained in Section 2, items C(1), C(3) through (33), E, F, K, and L of this renewed license within twenty-four (24) hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region II, or designee, not later than the first working day following the violation, with a written followup report within fourteen (14) working days.~~
- (2) SCE&G shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

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- H. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- I. In accordance with the Commission's direction in its Statement of policy, Licensing and Regulatory Policy and Procedures for Environmental Protection: Uranium Fuel Cycle Impacts, October 29, 1982, this license is subject to the final resolution of the pending litigation involving Table S-3. See, Natural Resources Defense Council v. NRC, No. 74-1586 (April 27, 1982).

- J. Additional License Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. 180, are hereby incorporated into this renewed license. South Carolina Electric & Gas Company shall operate the facility in accordance with the Additional Conditions.

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- K. Updated Final Safety Analysis Report

The South Carolina Electric & Gas Company Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CER 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The

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ADMINISTRATIVE CONTROLS

- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment.
- d. Events reportable pursuant to the Technical Specification 6.9 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the event and which provides recommendations to prevent recurrence. Such report shall be approved by the General Manager, Nuclear Plant Operations and forwarded to the Chairman of the Nuclear Safety Review Committee.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c and 6.5.3.1.d shall be members of the plant staff that meet or exceed the qualification requirements of Section 4 of ANSI 18.1, 1971, as previously designated by the General Manager, Nuclear Plant Operations. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved.

RECORDS

6.5.3.2 Records of the above activities shall be provided to the General Manager, Nuclear Plant Operations, PSRC and/or NSRC as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION

NOT USED

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PSRC and the results of this review shall be submitted to the NSRC and the Vice President, Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President, Nuclear Operations and the NSRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PSRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRC and the Vice President, Nuclear Operations within 14 days of the violation.

**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12**

ATTACHMENT III

PROPOSED CHANGES – RETYPED PAGES

- F. This renewed license is subject to the following additional condition for the protection of the environment:

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- G. Reporting to the Commission:

(1) DELETED

(2) SCE&G shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

- H. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

- I. In accordance with the Commission's direction in its Statement of policy, Licensing and Regulatory Policy and Procedures for Environmental Protection: Uranium Fuel Cycle Impacts, October 29, 1982, this license is subject to the final resolution of the pending litigation involving Table S-3. See, Natural Resources Defense Council v. NRC, No. 74-1586 (April 27, 1982).

- J. Additional License Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. 180, are hereby incorporated into this renewed license. South Carolina Electric & Gas Company shall operate the facility in accordance with the Additional Conditions.

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- K. Updated Final Safety Analysis Report

The South Carolina Electric & Gas Company Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The

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ADMINISTRATIVE CONTROLS

- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment.
- d. Events reportable pursuant to the Technical Specification 6.9 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the event and which provides recommendations to prevent recurrence. Such report shall be approved by the General Manager, Nuclear Plant Operations and forwarded to the Chairman of the Nuclear Safety Review Committee.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c and 6.5.3.1.d shall be members of the plant staff that meet or exceed the qualification requirements of Section 4 of ANSI 18.1, 1971, as previously designated by the General Manager, Nuclear Plant Operations. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved.

RECORDS

6.5.3.2 Records of the above activities shall be provided to the General Manager, Nuclear Plant Operations, PSRC and/or NSRC as necessary for required reviews.

6.6 NOT USED

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President, Nuclear Operations and the NSRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PSRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRC and the Vice President, Nuclear Operations within 14 days of the violation.

**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12**

ATTACHMENT IV

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by SCE&G, Virgil C. Summer Nuclear Station in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Bruce L. Thompson, Manager, Nuclear Licensing, (803) 931-5042.

COMMITMENT	Due Date/Event
The approved amendment will be implemented within 120 days.	Within 120 days upon receipt of amendment.