

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE BOX 764

COLUMBIA, S. C. 29218

October 15, 1981

Mr. Thyagaraja Chandrasekaran
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear . . . Chandrasekaran:

Attached are proposed changes to the latest draft (September 15, 1981) of the Radiological and Environmental Sections of the Technical Specifications for the V. C. Summer Nuclear Station.

The following is a brief explanation of the reasons for the requested changes:

<u>PAGE</u>	<u>EXPLANATION</u>
3/4 3-42	Items 2.a.i. and 2.c. are changed to allow us to set alarm/trip set points low enough to detect system changes but not so low as to cause spurious alarms. These levels are judged to be consistent with the installed instrumentation.
	Item 2.b.i. is changed to reflect the fact that the footnote "***" completely defines the requirement for this monitor.
3/4 3-44	ACTION 25 has been modified to insure that areas in which fuel is stored will have continuous monitoring.
	ACTION 30 has been changed to provide for alternate measurement of post-accident sampling needs. The safe operation of the plant will not be compromised by this change.
3/4 3-45	Item 2.b.i. has been changed to require surveillance in all modes since the 6" mini-purge has been approved for use in all modes.
3/4 3-51	Table 3.3-8 has been replaced by a new version that reflects our actual instrumentation.

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<u>PAGE</u>	<u>EXPLANATION</u>
3/4 3-52	Table 4.3-5 has been replaced with a new version consistent with the new table 3.3-8.
3/4 3-67	The "*" has been deleted - typographical error.
3/4 3-68	<p>Items 1.a. and 1.b.3. have been modified to reflect the fact that RM-L9 is a fully redundant monitor whose protection as determined by the ODCM will fully protect either or both paths guarded by RM-L5 and RM-L7 independent of mode of effluent release. i.e., the ODCM allows for either sequential or simultaneous releases from these two paths. ACTIONS 36 and 37 are no longer needed.</p> <p>Items 1.d. and 2.e. have been deleted because we do not intend to dump spent powdex to the pond after fuel load.</p> <p>Item 2.a. has been changed to reflect the fact that there is a separate flow measurement device for each of the two monitor tanks.</p> <p>Item 3. has been deleted from this table since this listing is redundant to a specification in table 3.3-9.</p>
3/4 3-69	<p>ACTION 34 has been modified to allow credit for flow information available from tank level and geometry information.</p> <p>ACTION 35 is omitted because item 3 has been deleted from the table.</p>
3/4 3-70	ACTIONS 36 and 37 are deleted because full credit is taken for RM-L9.
3/4 3-71	<p>Items 1.d., 2.d., and 3. have been deleted to be consistent with the new version of table 3.3-12.</p> <p>Item 2.a. is modified to indicate the two separate flow elements for tank 1 and tank 2.</p> <p>RM-L9 is deleted since, as built, the plant does not have a separate flow element specifically associated with the effluent line at the location of RM-L9. The flow at this point is the sum of other monitored flows.</p>

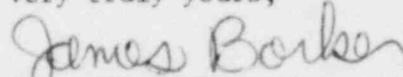
<u>PAGE</u>	<u>EXPLANATION</u>
3/4 3-72	<p>The note at the top of the page is deleted because item 3. has been deleted.</p> <p>Item (2) is deleted because it is not referenced in the table.</p> <p>Item (1) is modified to conform to the as built condition of the plant.</p>
3/4 3-74	<p>RM-A3 has been added, since this monitor has full interlock function and guards the release path from the waste decay tanks. It's set point determined by the ODCM will prevent releases in excess of 10CFR20 limits.</p>
3/4 3-76	<p>ACTION 44 is modified so as to transfer control to the appropriate specification. Reduction to "hot standby" is more restrictive than the requirement for operating the waste gas system.</p>
3/4 3-78	<p>Item 3.a. is modified to reflect the fact that the 6" purge line may be in continuous use.</p> <p>Item 4.a. is modified to insure the interlock function of RM-A3 is tested.</p>
3/4 3-79	<p>Item (2) is deleted because it is not referenced in the table.</p> <p>Item (1) is modified to conform to the as built condition of the plant.</p>
3/4 11-2	<p>Item A.2. is deleted since we no longer intend to release powdex to the settling pond.</p>
3/4 11-8 and 3/4 11-9	<p>The settling pond limiting conditions based on powdex resin slurry no longer apply. We will not send powdex to the pond after fuel load.</p>
B-3/4 11-3	<p>Same as 3/4 11-8 and 3/4 11-9.</p>
3/4 11-11	<p>Item B. has been modified to indicate it references the 36" purge line. Footnote b is deleted since it does not apply. i.e., the 36" line can only be used in modes 5 and 6.</p> <p>Item C. is modified to reflect that the 6" purge line may be in continuous use and need sampling comparable to the main plant vent.</p>

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<u>PAGE</u>	<u>EXPLANATION</u>
3/4 11-11 cont'd	Footnote b is deleted because these paths are continuously monitored and alarmed if there is a significant increase in the radioactivity. If an alarm is received, plant procedures require that additional sampling be initiated to establish additional surveillance on the release. If plant shutdown, startup, or 15% per hour load changes result in a significant increase in the radioactivity being released via these paths, then additional samples will be taken. However, if these conditions do not result in any significant change, there is no basis for requiring additional samples.
	Item E. is deleted since this is not a reference to a sampling or analysis program but rather to radiation monitors whose set points are determined via the ODCM.
3/4 11-13	Item b. is deleted because it is no longer referenced in the table.
3/4 11-18	The limiting curie content of a gas storage tank has been increased to reflect the limit of 0.5 rem exposure at the site boundry if one tank should rupture. (See FSAR Table 15.3-4 and Page 15.3-17 21,659 Ci implies a dose of 0.116 rem so 93,358 Ci implies a dose of 0.5 rem). The surveillance requirements are modified to reduce unnecessary sampling and counting. (See NUREG-0697, Rev. 1, Page 3/4 11-16).
3/4 12-5	Typographical correction.
3/4 12-6	Typographical correction.
3/4 12-17	VCS does not have elevated releases.

Should you have any questions or concerns about these changes, please call.

Very truly yours,


James H. Barker, PhD
Staff Health Physicist

JHB/cao
Attachment