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A SCANA Company

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May 25, 1993
RC-93-0143

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U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. S. D. Ebneter
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street, N.W.
Atlanta, GA 30323

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
EMERGENCY FEEDWATER SYSTEM TECHNICAL SPECIFICATION 4.7.1.2
OPERABILITY OF TURBINE DRIVEN EMERGENCY FEEDWATER PUMP
REQUEST FOR ENFORCEMENT DISCRETION AND TECHNICAL SPECIFICATION
CHANGE (TSP 930009)

In accordance with 10CFR2, Appendix C, South Carolina Electric & Gas Company (SCE&G) requests Enforcement Discretion from compliance with existing technical specification surveillance requirement 4.7.1.2.a.2, and submits an exigent amendment request to License NPF-12 to change the Technical Specification (TS) 4.7.1.2.a.2 for VCSNS. Existing TS 4.7.1.2.a.2 prescribes that the turbine driven emergency feedwater pump be tested with secondary steam pressure greater than 900 psig. SCE&G proposes to change TS 4.7.1.2.a.2 to perform the turbine driven pump surveillance test at secondary steam pressure greater than or equal to 865 psig, see Enclosure 1. This request is intended to preclude unnecessary plant load reduction to perform the surveillance test.

The following information is provided in support of this request:

Existing Technical Specification Surveillance Requirement 4.7.1.2.a.2 requires that the turbine driven emergency feedwater pump (EFWP) be demonstrated operable by verifying that it develops a discharge pressure greater than or equal to 1330 psig at a flow greater than or equal to 97 gpm when the secondary steam supply pressure is greater than 900 psig. After the increase in the tube plugging in the steam generators during our recent refueling outage, the main steam pressure at full power has decreased below 900 psig. This condition was expected and described in our submittal for increasing the Steam Generator Tube Plugging from 15% to 18%. The 900 psig steam pressure required by the surveillance can not be achieved with the plant operating at full power.

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The surveillance test for the turbine driven EFWP is due on May 27, 1993. Preventive maintenance work associated with the pump is scheduled to be performed on May 25, 1993, thus requiring an acceptance test to be performed prior to returning the pump to service. The post maintenance testing is performed in accordance with the surveillance requirement.

This request is based on the present design capability of the turbine driven EFWP. The steam turbine governor valve throttles the steam supply flow down to the maximum steam ring pressure of 750 psig for any steam supply pressures greater than 750 psig. The maximum calculated pressure drop in the steam supply line at full steam flow, including leakages, at turbine rating conditions is approximately 112 psig. If the full flow pressure drop is adopted as the maximum pressure loss, then the required pressure at the steam generators for performing the surveillance test shall be approximately 862 psig, which is below existing operating conditions. Testing or operating the turbine driven EFWP when minimum secondary steam supply pressure is equal to or greater than 865 psig does not impact the performance of the pump since at this steam pressure the turbine is capable of developing the brake horsepower required by the pump for its full operating condition.

There are no compensatory measures needed to perform the surveillance test or operate the turbine driven EFWP when secondary steam supply pressure is equal to or greater than 865 psig. The surveillance requirement for discharge pressure (1330 psig) and flow (97 gpm) will be met.

This request shall be valid through the current operating cycle and is justified on the basis of the analysis performed in support of the license amendment to increase the plugging margin of the steam generators, which was approved and issued as Amendment 111 on March 18, 1993. The testing of the pump at steam generator pressures lower than 900 psig does not affect the operability of the pump.

The request to test the turbine driven pump at steam pressure below 900 psig does not affect the ability of the emergency feedwater system to function following a design basis event; it will not change the availability of the system, it will not change the flow parameters, and it will not impact the system response time or its initiation. Therefore, the request will not have a potential adverse impact on the public health and safety, nor will a significant safety hazard be involved.

Since the proposed change does not involve any change to the operation of the plant or its physical configuration, there will be no adverse impact to the environment.

Should you have any questions, please contact Mr. M. W. Gutierrez at (803) 345-4392.

Very truly yours,

D A Lavrie for

John L. Skolds

MWG:lcd
Attachments

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NSRC
Central File System
RTS (TSP 930009)
File (813.20)