

Enclosure 1 to Document Control Desk Letter
TSP930009
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PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP 930009
VIRGIL C. SUMMER NUCLEAR STATION

LIST OF AFFECTED PAGES AND DESCRIPTION OF CHANGES

Page	Specification	Description of Change
3/4 7-4	4.7.1.2	Changed the secondary steam supply pressure to 865 psig

PLANT SYSTEMS

EMERGENCY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator emergency feedwater pumps and flow paths shall be OPERABLE with:

- a. Two motor-driven emergency feedwater pumps, each capable of being powered from separate emergency busses, and
- b. One steam turbine driven emergency feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- a. With one emergency feedwater pump inoperable, restore the required emergency feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two emergency feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three emergency feedwater pumps inoperable, immediately initiate corrective action to restore at least one emergency feedwater pump to OPERABLE status as soon as possible.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each emergency feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Verifying that each motor driven pump develops a discharge pressure greater than or equal to 1600 psig at greater than or equal to 90 gpm flow.
 2. Verifying that the steam turbine driven pump 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. The provisions of Specification 4.0.4 are not applicable. 865
 3. Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

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 3. Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

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DESCRIPTION AND SAFETY EVALUATION

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS TS, Section 4.7.1.2, to perform the turbine driven EFW pump (EFWP) surveillance test at secondary steam pressure greater than or equal to 865 psig.

SAFETY EVALUATION

The proposed change to the secondary steam pressure required to test the turbine driven EFWP reflects the results 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 No. 111 on March 18, 1993. After increasing the tube plugging in the steam generator during last refueling outage, the main steam pressure at full power has decreased below the 900 psig required for testing as required by existing surveillance requirement 4.7.1.2. This condition was expected as stated above.

The proposed request to test the turbine driven EFWP at secondary steam pressure equal to or greater than 865 psig continues to provide conservative and adequate margin to ensure pump capability.

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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DESCRIPTION OF AMENDMENT REQUEST

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BASIS FOR DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

SCE&G has evaluated the proposed TS change and has determined that it does not represent a significant hazards consideration, based on the criteria established in 10CFR50.92(c). Operation of VCSNS in accordance with the proposed action will not:

- (1) Involve a significant increase in the probability or the consequences of an accident previously evaluated.

The proposed amendment changes the test conditions for which surveillance Requirement 4.7.1.2.a.2 is performed and proposes no other significant change to the subject surveillance. Testing the turbine-driven emergency feedwater pump at a steam pressure below 900 psig does not adversely affect either the availability or the functional performance of the emergency feedwater system. At the proposed steam pressure, the EFW pump remains capable of developing sufficient brake horsepower to develop full operating conditions. As such, the proposed testing adequately demonstrates the functional performance of the turbine-driven emergency feedwater pump.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed revised testing does not affect the emergency feedwater system initiation, system response time, or system functional performance. The proposed amendment changes the test conditions under which the turbine-driven emergency feedwater pump will be tested and does not involve physical changes to the emergency feedwater system. As such, new or different accidents are not created.

- (3) Involve a significant reduction in a margin of safety.

The functional performance of the emergency feedwater system functional performance is not changed as a result of the revised testing. As such, current margins of safety are maintained.