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VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

March 26, 1982

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

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Modified Response to FSAR
Question 211.39

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) herein provides an update to the FSAR discussion regarding actions taken by the operator that would effect a LOCA during the time accumulator isolation valves are closed with power locked out.

This revision is shown on the attached FSAR page 211.39, Item 2, and will be incorporated into the next amendment to the FSAR.

The change to the FSAR is consistant with current Technical Specification 3.5.3 and is still consistant with the analysis requested by Question 211.39.

If you have any questions, please let us know.

Very truly yours,

for T. C. Nichols, Jr.

RBC:TCN:lkb

Attachment

cc: V. C. Summer (w/o attach.)
G. H. Fischer (w/o attach.)
H. N. Cyrus
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211.39 Assess the potential for, and consequences of, a LOCA during the time the accumulator injection tanks are isolated with power locked out to valve operators. (That is, during shutdown and startup operations.)

RESPONSE

During the shutdown the following operator actions pertain to the isolation of ECCS equipment and would effect a LOCA during the time accumulator isolation valves are closed with power locked out. (Startup is not addressed since shutdown is more limiting due to the higher core decay heat generation):

1. At 1900 psig the operator is instructed to manually block the automatic safety injection signal. This action disarms the safety injection signals from the pressurizer pressure transmitter along with the steam flow transmitters. All other safety injection signals including containment high pressure and high steam line differential pressure are armed and will actuate safety injection if their setpoints are exceeded. Manual safety injection actuation is also available. 9

2. At 1000 psig, the operator closes and locks out the safety injection accumulator isolation valves. At 300°F, he also locks out all but one high head charging pump. At this time, two residual heat removal pumps (low head safety injection) would be available from either automatic or manual safety injection actuation. 31

3. At less than 425 psig and 350°F, the operator aligns RHRS suction to the RCS. The valves in the line from the refueling water storage tank (RWST) are closed.

The significance of these actions on the mitigation of a LOCA when power is locked out to the isolation valves is that: