South Carolina Electric & Gas Company P.O. Box 88 Jenkinsville, SC 29065 (803) 345-4040



John L. Skolds Vice President Nuclear Operations

March 11, 1994 Refer to: RC-94-0069

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

Attention: Mr. G. F. Wunder

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION DOCKET NO. 50/395 **OPERATING LICENSE NO. NPF-12** STEAM GENERATOR REPLACEMENT TECHNICAL SPECIFICATION CHANGE REQUEST (REM 6000-10, TSP 930019)

On January 9, 1992, South Carolina Electric & Gas Company (SCE&G) met with NRC representatives to discuss the Virgil C. Summer Nuclear Station (VCSNS) Steam Generator Replacement (SGR) Project. In this meeting, it was agreed that early submittal of discrete packages of analyses would aid NRC review and approval of the analyses and associated Technical Specification changes to support SCE&G's September 1994 SGR outage. Where possible, analyses and evaluations performed to support the Replacement Steam Generators (RSGs) utilized the Engineered Safeguards Gesign Rating ("stretch" power rating) of 2900 MWt core power. This conservatively unds the current licensed core power of 2775 MWt and minimizes future reanaliss offort for a potential stretch power application. However, it should be explasized that approval is not being sought at this time for stretch power operation.

To date, four submittals (dated September 3, 1992, March 12, 1993, April 30, 1993, and October 29, 1993) have been provided to support SGR. This submittal provides the final safety analysis results for Small Break Loss of Coolant Accidents and a related Technical Specification change. In order to provide one complete document for the licensing submittal, this final submittal is provided as revised replacement pages to the October 29, 1993 letter.

The topics addressed in this submittal include revised pages for:

- The Table of Contents .
- The List of Tables (page v only)
- The Executive Summary .
- ٠ Section 1.0 - Introduction - Description of License Amendment Request change : NEC PUR I INP NSIC I INP
- . Section 3.1 - Loss of Coolant Accident Analyses
- . Section 3.11 - Summary of Technical Specification Changes

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- Section 4.0 Conclusions
- Appendix 1 Assessment of Unreviewed Safety Questions (10CFR50.59)
- Appendix 2 No Significant Hazards Determination (10CFR50.92)
- Appendix 3 Proposed Technical Specification Changes
- Appendix 4 WCAP-13480, "Westinghouse Delta 75 Steam Generator Design and Fabrication Information for Virgil C. Summer Nuclear Station"
- Appendix 6 VCSNS FSAR Chapter 15 Write-Ups
- Appendix 7 VCSNS SI Pump Test Report

Also attached is a copy of the revised Technical Specification page (page 3/4 5-6) for NRC issuance.

The Executive Summary provides the results of the analyses and evaluations contained in the Licensing submittal. In all cases, acceptable results have been obtained for the revised operating conditions associated with the RSGs.

SCE&G plans to start the SGR outage in early September 1994. Therefore, NRC review and approval of the enclosed Technical Specification change is requested by August 31, 1994. An implementation period of three months is requested to allow for plant documentation revisions to support the approved Technical Specification change.

Please note that WCAP-13480 has been revised to reflect the latest design information for the Delta 75 steam generator.

Enclosed are:

- WCAP-13480, Revision 1, "Westinghouse Delta 75 Steam Generator Design and Fabrication Information for Virgil C. Summer Nuclear Station" (Proprietary).
- WCAP-13481, Revision 1, "Westinghouse Delta 75 Steam Generator Design and Fabrication Information by Virgil C. Summer Nuclear Station" (Non-Proprietary).

Also enclosed are a Westinghouse authorization letter, CAW-93-545, accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Document Control Desk TSP 930019 Page 3 of 3

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-93-545 and should be addressed to Nicholas J. Liparulo, Manager of Nuclear Safety and Regulatory Activities, Westinghouse Electric Corporation. P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

This Technical Specification has been reviewed and approved by the PSRC and the NSRC. 1 declare that the statements and matters set forth herein are true and correct to the best of my knowledge, information, and belief.

SCE&G appreciates NRC's efforts to support the SGR schedule. If you have any questions, please contact April Rice at (803) 345-4232.

Very truly yours,

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John L. Skolds

ARR/JLS/nkk Attachments

O. W. Dixon C: R. R. Mahan (w/o attachments) R. J. White S. D. Ebneter 
 NRC Resident Inspector
 RTS (TSP 930019, REM 6000-10)

 J. B. Knotts Jr.
 File (810.39, 813.20)
A. A. Craft

L. R. Cartin R. B. Clary NSRC Central File System

## AFFIDAVIT

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## COMMONWEALTH OF PENNSYLVANIA:

## COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Henry A. Sepp, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Corporation ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

Henry A. Sepp, Manager Strategic Licensing Issues

Sworn to and subscribed before me this  $215^{\pm}$  day of <u>December</u>, 1993

Zelica Coraine M.

Notary Public

Notarial Seal Lorraine M. Piplica, Notary Public Monroeville Boro, Alleghany County My Commission Expires Dec. 14, 1995