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

John L. Skolds Vice President Nuclear Operations

DEC 1 8 1990

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION

DOCKET NO. 50/395

OPERATING LICENSE NO. NPF-12

TECHNICAL SPECIFICATION CHANGE - TSP 880025-0

INCREASED SURVEILLANCE TEST INTERVALS AND ALLOWED OUTAGE TIMES FOR REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM

INSTRUMENTATION

- References: 1. Letter from C. O. Thomas (NRC) to J. J. Sheppard (WOG) dated February 21, 1985 - "Safety Evaluation by the Office of Nuclear Reactor Regulation -- WCAP-10271, Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System.
  - 2. Letter from Charles E. Rossi (NRC) to Roger A. Newton (WOG) dated February 22, 1989 - "Safety Evaluation by the Office of Nuclear Reactor Regulation Review of Westinghouse Report WCAP-10271 Supplement 2 and WCAP-10271 Supplement 2, Revision 1 on Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System."
  - 3. WCAP-10271 Supplement 1-P-A, Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System, May 1986.
  - 4. WCAP-10271-P-A Supplement 2, Revision 1, Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System, May 1989.
  - Letter from Charles E. Rossi (NRC) to Gerard T. Goering (WOG) dated April 30, 1990 (NRC Supplemental Safety Evaluation for WCAP-10271 Supplement 2, Revision 1).

In accordance with 10CFR50.90, South Carolina Electric & Gas Company (SCE&G) is enclosing a requested amendment to License NPF-12 to change the Technical Specifications (TS) for the Virgil C. Summer Nuclear Station (VCSNS). The proposed change is a revision to TS 3/4.3.1, "Reactor Trip System Instrumentation," 3/4.3.2, "Engineered Safety Feature Actuation System," and associated Basis 3/4.3. The proposed change revises surveillance test intervals (STI) and allowed outage times (AOT) for Engineered Safety Features Actuation System (ESFAS) and Reactor Trip System (RTS) instrumentation in agreement with WCAP-10271.

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The proposed TS change is identified in Enclosure 1. The safety evaluation, including confirmation of the applicability of the generic analysis and accountability of instrument drift in the setpoint calculation methodology. is provided in Enclosure 2. A proposed no significant hazards evaluation performed pursuant to 10CFR50.92 is provided in Enclosure 3.

The changes proposed are needed to minimize: 1) the potential impact of current testing: inadvertent trips, unnecessary transients and challenges to safety systems; and 2) maintenance requirements on the plant: significant time and effort to plan, perform, track and review testing, surveillance and maintenance activities. Therefore, SCE&G requests NRC review and issuance of the proposed amendment by May 31, 1991, and that the revised TS be made effective within 60 days of NRC issuance of the License Amendment.

The proposed TS change has been reviewed and approved by the Plant Safety Review Committee and the Nuclear Safety Review Committee.

I declare that the statements and matters set forth herein are true and correct to the best of my knowledge, information and belief.

Should you have any questions concerning this issue, please call Mr. M. W. Gutierrez of my staff at (803) 345-4392.

Very truly yours,

John L. Skolds

MWG:JLS:1cd Attachments

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