



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 19, 1990

Docket No. 50-395

Mr. John L. Skolds
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
P.O. Box 88
Jenkinsville, South Carolina 29065

Dear Mr. Skolds:

SUBJECT: DENIAL OF AMENDMENT REQUESTS ON FEEDWATER ISOLATION VALVES
AND MAIN STEAM ISOLATION VALVES - V. C. SUMMER NUCLEAR STATION,
UNIT NO. 1 (TAC NOS. 72893 AND 74822)

By letters dated April 5, 1989, and July 21, 1989, as modified on September 21, 1989, you requested modification of the Action Statements to Technical Specifications (TS) 3.7.1.5, Main Steam Line Isolation Valves, and 3.7.1.6, Feedwater Isolation Valves. You proposed that the Action Statement be changed to allow more than one of the valves to be inoperable while in MODES 2 or 3 provided the affected valves were maintained closed. You also stated that such a change would not impact plant safety because the valves would be maintained in their closed position which supports the licensing basis of the plant since the safety analysis assumptions are that the valves are closed upon receipt of an isolation signal. The proposed Action Statement is consistent with the Action Statement currently planned for the new Standard Technical Specifications being developed in the Technical Specification Improvement Program. These new Standard Technical Specifications will be available for adoption by licensees early next year.

During discussions with the industry on the implementation of the Technical Specifications Improvement Program, the staff addressed the issue of whether a licensee could select, as you propose, only certain portions of the new Standard Technical Specifications rather than the complete set. A January 22, 1988, letter from Thomas E. Murley, Director of the Office of Nuclear Reactor Regulation to Mr. Joe F. Colvin, Executive Vice President and Chief Operating Officer of NUMARC stated that:

..., the licensee may choose to either retain his current specification in its entirety or adopt the new specification in its entirety....

This approach is considered necessary because the new Standard Technical Specifications were developed in such a way that the definitions, limiting conditions for operation, surveillance requirements, bases, etc. are closely related. Selecting just one requirement and incorporating this requirement into another set of technical specifications may not result in the desired level of protection or may not result in satisfying the original intent of the requirement in the new Standard Technical Specifications. In addition, the

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Mr. John L. Skolds

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NRC's approach minimizes the expenditure of both industry and NRC resources. Of course, an exception to this position is acceptable when the change is necessary for safety reasons. Discussions with your staff have indicated that there are no overlying safety reasons associated with your requests.

The Technical Specifications Improvement Program also made provisions for line item improvements to the technical specifications for items generic to one or more vendor type of plant which would be available to licensees in advance of the new Standard Technical Specifications. Line item improvements are proposed changes to existing technical specifications which may be made independent of the new Standard Technical Specifications. In addition to those line item improvements proposed by the staff, the owners groups have also proposed issues to be treated as line item improvements (for example, changes to surveillance test intervals and allowed outage times for safety related instrumentation).

If a licensee desires a change which is generic in nature, the licensee should propose this change to the respective owners group. That owners group would then propose the change to the NRC staff and support its review. Upon acceptance by the NRC staff, the change would be made available to all licensees in a generic letter as a line item improvement. The staff attempts, in these generic letters, to present the item in a manner which will require the least review when requested by individual licensees.

It appears that the changes you have requested should be proposed to your owners group as a line item improvement, if you desire these items prior to your request for the new Standard Technical Specifications. Therefore, your requests are denied.

A copy of the Notice of Denial of Amendment to be published in the Federal Register is enclosed for your information.

Sincerely,

Original Signed By:
George F. Wunder, Project Manager
Project Directorate II-1
Division of Reactor Projects
Office Of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/encl:
See next page

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Mr. John L. Skolds
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Virgil C. Summer Nuclear Station

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