

*Official*

November 29, 1990

Docket No. 50-395  
License No. NPF-12

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

Gentlemen:

SUBJECT: REQUEST FOR CHANGE IN QUALITY ASSURANCE PROGRAM BIENNIAL REVIEWS OF  
V. C. SUMMER NUCLEAR PLANT PROCEDURES

We have reviewed your letter dated June 7, 1990, submitting a proposed change to the Quality Assurance Program as described in the V. C. Summer Nuclear Station Final Safety Analysis Report (FSAR). Specifically, this change involved FSAR, Appendix 3A, item 1.33 regarding biennial review of plant procedures. You have requested deletion of this biennial review commitment.

The motivation stated in your request for this commitment reduction was that 26,950 manhours are used annually to meet this commitment. The manpower savings could be applied to other areas of procedural development.

The justification stated in the request indicated the biennial procedure review was redundant; existing programs and activities provided adequate revision control elements. The following programs and activities were referenced as providing adequate procedure revision controls.

- Plant Modifications Program
- Non-Conformance Program
- Off-Normal Occurrence Program
- Operator Feedback Program
- Surveillance Test Program
- Operating Experience Review Program
- Technical Specification and FSAR Revision Process
- Corrective Actions for Regulatory Issues
- Quality Assurance Program

As a result of discussions with Region II staff on July 19 and September 26, 1990, an additional letter was submitted to provide clarification regarding the basis for the requested commitment alteration. This letter, dated October 22, 1990, stated that the V. C. Summer Quality Systems Group will perform a biennial Quality Assurance audit of the procedural development program utilizing a representative sampling process. The biennial audit will provide verification that the existing plant programs and activities listed above and in your June 7, 1990 letter, are effective in maintaining procedures current.

*IF 43*  
*FE 01* 1/0

November 29, 1990

With the above biennial audit provision included, we believe the change to be an acceptable alternative commitment and that your program, as revised, will continue to meet the requirements of 10 CFR 50, Appendix B.

If additional information is required, please contact F. Jape of my staff at FTS 841-4182.

Sincerely,  
Original signed by  
Caudle A. Julian

Albert F. Gibson, Director  
Division of Reactor Safety

cc: G. G. Sault, General Manager  
Nuclear Plant Operations  
Summer Nuclear Station  
P. O. Box 88 (Mail Code 300)  
Jenkinsville, SC 29065

A. R. Koon, Jr., Manager  
Nuclear Licensing  
Summer Nuclear Station  
P. O. Box 88 (Mail Code 830)  
Jenkinsville, SC 29065

J. B. Knotts, Jr.  
Bishop, Cook, Purcell & Reynolds  
1400 L Street, NW  
Washington, D. C. 20005-3502  
R. V. Tanner  
Executive Vice President  
South Carolina Public  
Service Authority  
P. O. Box 398  
Moncks Corner, SC 29461-0398

Chairman, Fairfield County Council  
P. O. Box 293  
Winnsboro, SC 29180

Attorney General  
Box 11549  
Columbia, SC 29211

Heyward G. Shealy, Chief  
Bureau of Radiological Health  
South Carolina Department of Health  
and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

bcc: (See page 3)

November 29, 1990

bcc: G. Wunder, NRR Project Manager  
Document Control Desk  
DRP Section Chief  
F. Jape, DRS/RII

NRC Resident Inspector  
U.S. Nuclear Regulatory Commission  
Route 1, Box 64  
Jenkinsville, SC 29065

*[Signature]*  
RII:DRS  
RMoore:td  
11/26/90

*[Signature]*  
RII:DRS  
FJape  
11/26/90

*[Signature]*  
RII:DRS  
CJulian  
11/26/90

*[Signature]*  
RII:DRP  
fmcantrell  
11/27/90