



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

February 14, 1991

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 REQUEST REGARDING FEEDWATER AND MAIN STEAM
ISOLATION VALVE OPERABILITY (TAC NOS. 72893 AND 74822)

This is in response to your letter dated January 28, 1991, which requested reconsideration of the denial of two technical specification amendment requests contained in our letter dated December 19, 1990. Our December 19, 1990, letter denied the amendment requests because they constituted a partial implementation of the new Standard Technical Specifications developed under the Technical Specifications Improvement Program. The amendment requests further represented relaxations in the current technical specifications, are generic to Westinghouse plants from both a safety and a design standpoint, and would not represent a significant improvement in safety. Your January 28, 1991, letter does state that there is a specific commercial need for the amendments on the Virgil C. Summer Nuclear Station due to problems experienced with the Feedwater Isolation Valves. Your letter does not elaborate on why such problems are unique to Summer.

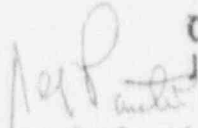
The basic issue concerns allocation of NRC resources to review a generic technical specification for only one plant when the technical specification is primarily for convenience and of low safety significance. The Technical Specification Improvement Program was implemented to improve operational safety through a total reconsideration of technical specifications and does, indeed, include a number of relaxations from current existing technical specifications. It also results in the relocation of a large number of limiting conditions of operation from the technical specifications to licensee controlled documents which can be modified under 10 CFR Part 50.59. However, the new Standard Technical Specifications contain significantly improved bases and are formatted to significantly reduce ambiguity of interpretation and errors by operators. These improvements, taken in total, represent a significant improvement to safety.

NRC resources can be most efficiently used in reviewing amendment requests to convert to the new Standard Technical Specifications rather than reviewing individual plant amendments. However, we have recognized that some changes to existing technical specifications are desirable even where licensees are not converting to the new Standard Technical Specifications and even where the changes are primarily relaxations having no significant safety benefit. We have thus developed the concept of line item improvements. Line item improvements address technical specification changes generically and in an

orderly, efficient manner involving a number of owners. They are reviewed, formatted, fine-tuned, in a standard manner, one time, and then can be adopted by individual licensees voluntarily. They are also reviewed, where appropriate, by the Committee to Review Generic Requirements. By involving the owners groups in the line item improvements, the changes can be prioritized to allow efficient use of NRC resources. Furthermore, the line item improvement approach minimizes technical, format, and wording variations from plant to plant which will inevitably occur when licensees come in independently for basically the same technical specification relaxation. Such variations absorb resources and detract from safety.

We believe the practice of denying amendments such as those addressed in our December 19, 1990, letter is more appropriate than maintaining them in our outstanding workload with the low safety priority that they warrant. In summary, your request has been reconsidered and for the reasons stated herein is denied.

Sincerely,



Original signed by
James G. Partlow

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

cc: See next page

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DATE	:02/12/91	:02/13/91	:	:	:

Mr. John L. Skolds
South Carolina Electric & Gas Company

Virgil C. Summer Nuclear Station

cc:

Mr. R. J. White
Nuclear Coordinator
S.C. Public Service Authority
c/o Virgil C. Summer Nuclear Station
P. O. Box 88 (Mail Code 602)
Jenkinsville, South Carolina 29065

J. B. Knotts, Jr., Esq.
Bishop, Cook, Purcell
and Reynolds
1400 L Street, N.W.
Washington, D. C. 20005-3502

Resident Inspector/Summer NPS
c/o U.S. Nuclear Regulatory Commission
Route 1, Box 64
Jenkinsville, South Carolina 29065

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission,
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323

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

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

South Carolina Electric & Gas Company
Mr. A. R. Koon, Jr., Manager
Nuclear Licensing
Virgil C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, South Carolina 29065

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