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B 0 4 1991

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 SPECIFICATIONS CHANGE REQUEST: REQUIRED SHUTDOWN MARGIN
CURVE (TSP 900003-2) (TAC NO. 76977)

In a letter dated May 3, 1990, South Carolina Electric & Gas Company (SCE&G) informed the Nuclear Regulatory Commission (NRC) that the boron worths for Modes 3 and 4 in the Virgil C. Summer Nuclear Station (VCSNS) Cycle 6 core are more negative than the boron worths assumed in the existing Boron Dilution Accident Analysis. As a result, the Required Shutdown Margin curve [Figure 3.1-3, "Required Shutdown Margin (Modes 3, 4, and 5)" in the VCSNS Technical Specifications] will not ensure that the operator has sufficient time (previously accepted as 13.4 minutes for Mode 3 and 13.6 minutes for Mode 4) from receipt of an alarm to terminate a boron dilution event prior to a loss of shutdown margin. In the subject letter, SCE&G committed to administratively control operations to abide by a more restrictive Required Shutdown Margin curve which incorporates the adjusted boron worths for Modes 3 and 4. Additionally, SCE&G committed to expeditiously process and submit a Technical Specifications Change Request (TSCR) to replace the errant Figure 3.1-3 with the more restrictive curve.

During subsequent conversations with J. J. Hayes Jr. and D. B. Fieno (both of the NRC), SCE&G learned that approval had been granted, for at least one plant, to remove the Required Shutdown Margin curve from Technical Specifications and place it in the Core Operating Limits Report (COLR). After discussing this with J. J. Hayes Jr. and L. P. Modenos (VCSNS Resident Inspector), SCE&G decided to request approval for placing Figure 3.1-3 in the COLR. VCSNS submitted this TSCR in a July 18, 1990, letter to the Document Control Desk.

As stated in the July submittal, SCE&G maintains that required shutdown margin limits are cycle specific, making the Required Shutdown Margin curve a candidate for inclusion in the COLR. Because boron worths may vary with each reload cycle, bounding values of the parameter must be chosen for future cycles when compiling the data points for Figure 3.1-3. This necessity to bound future cycles can place undue restrictions on operations during earlier cycles.

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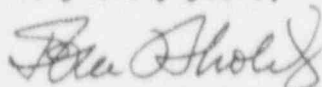
In a recent conversation, G. F. Wunder of the NRC informed SCE&G that the TSCR for relocating the Required Shutdown Margin curve to the COLR will be denied. The reason delineated for the impending denial is the NRC position that required shutdown margin limits are not cycle specific parameters. SCE&G still maintains the position that the subject limits are cycle specific. However, SCE&G wishes to withdraw the July 18, 1990, request and submit, in its place, the attached TSCR to revise Figure 3.1-3 to incorporate the more negative boron worths in Modes 3 and 4. The proposed changes to the Technical Specifications are provided as Attachment 1. Attachment 2 provides the required safety evaluation. Attachment 3 contains the proposed curve superimposed on the current Figure 3.1-3 in the VCSNS Technical Specifications. The proposed no significant hazards evaluation is provided as Attachment 4.

Additionally, an administrative change is included in the attached TSCR to revise Basis 3/4.2-1, "Axial Flux Difference," to refer to the COLR rather than the Peaking Factor Limits Report (PFLR). Amendment No. 28 to the VCSNS Operating License replaced the PFLR with the COLR.

This request has been reviewed and approved by the Plant Safety Review Committee and the Nuclear Safety Review Committee. SCE&G requests the NRC to review and approve this TSCR by May 15, 1991.

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, please call at your convenience.

Very truly yours,



John L. Skolds

EWR:JLS:lcd
Attachments

c: O. W. Dixon Jr. (w/o attachments)
R. R. Mahan
R. J. White
S. D. Ebnetter
G. F. Wunder
General Managers
NRC Resident Inspector

J. B. Knotts Jr.
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RTS (TSP 900003)
File (L13.20)