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MAR 04 1991

Dr. Thomas E. Murley  
Director, Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Dr. Murley:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
DENIAL OF AMENDMENT REQUEST FOR FEEDWATER &  
MAIN STEAM ISOLATION VALVES (TAC NOs. 72893 & 74822)

In letters dated April 5, 1989, and July 21, 1989, South Carolina Electric & Gas Company (SCE&G) requested revisions to the Action Statements for Technical Specifications (TS) Limiting Conditions for Operations (LCO) 3.7.1.6, "Feedwater Isolation Valves," and 3.7.1.5, "Main Steam Isolation Valves."

On December 26, 1990, SCE&G received a letter dated December 19, 1990, from the NRC Project Manager denying both TS revisions. In a letter to the NRC dated January 28, 1991, SCE&G requested that the NRC reconsider their denial. On February 19, 1991, SCE&G received a letter dated February 14, 1991, from the NRC Associate Director for Projects Office of Nuclear Reactor Regulation denying SCE&G's request for reconsideration. In both the December 19, 1990, and the February 14, 1991, letters, the stated reasons for the denials were that both TS submittals constituted a partial implementation of the new Standardized Technical Specifications (STS), and that they were generic to Westinghouse plants from both a safety and a design standpoint and would not represent a significant improvement in safety.

SCE&G has decided not to request a hearing for these Technical Specification changes. However, several aspects of NRC's management of this process appear to be unclear or poorly implemented.

1. It took the NRC 20 months to deny a Technical Specification request. During these 20 months, SCE&G was also asked to reformat the request and expand the safety analysis. Neither the reformatting nor the safety analysis expansion played a part in the denial of the Technical Specification amendment request.
2. The NRC is denying the request based partially on the fact that the amendment is a partial implementation of the new STS. SCE&G reiterates its position that the NRC's referral to a draft document is not appropriate.

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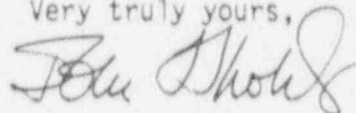
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3. The NRC is adopting a policy to deny TS amendment requests that have potential generic applications. In the NRC's opinion, these requests should be referred to the respective owner group for generic industry submittal to the NRC. This policy has been adopted by the NRC without defining "generic." Without some guidance, there will be no consistency in how this criterion is applied.
4. The NRC is communicating its policy on TS changes through the denial of revision requests. It would seem that a policy change of this type should be communicated to the industry before it is implemented. The NRC has a number of effective means of communicating information to the industry, and SCE&G strongly encourages the NRC to use them.

SCE&G is interested in having TS that provide for the safe operation of the plant. Both the NRC and the industry have recognized for some time that present TS need improvement. However, current NRC policy on TS changes does nothing to improve them; rather it presents unclear obstacles to the improvement process.

SCE&G strongly urges the NRC to provide to the industry clear guidance on TS amendments. SCE&G will pursue this issue through NUMARC.

Very truly yours,



John L. Skolds

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