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AUG 26 1991

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U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
TECHNICAL SPECIFICATION CHANGE - TSP 900004-2
CERTIFICATION OF TRAINING PROGRAMS

References: SCE&G letters to the NRC dated June 11, 1991, and December 7, 1990, same subject as above

Via letter dated June 11, 1991, South Carolina Electric & Gas Company (SCE&G) requested approval of a revised amendment request originally submitted on December 7, 1990. This requested amendment was to update Technical Specification (TS) section 6.4 regarding training requirements of unit staff personnel. However, based on discussions with NRC staff personnel, SCE&G understands that the proposed revision to its original submittal is not deemed acceptable by the NRC. Therefore, SCE&G has decided to pursue a revision to the June 11, 1991, submittal.

This revision to the June 11, 1991, submittal deletes the reference to Regulatory Guide (RG) 1.8, Revision 2, April 1987, in TS 6.3 and 6.4, provides the specific applicable section of ANSI 3.1, 1981 in TS 6.4, and incorporates the revised regulation in 10CFR55.

The proposed TS change is identified in Enclosure 1. The safety evaluation is provided in Enclosure 2. The proposed no significant hazards consideration is provided in Enclosure 3.

This proposed TS change has been reviewed and approved by the Plant Safety Review Committee and the Nuclear Safety Review Committee.

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 concerning this issue, please call Mr. Manuel W. Gutierrez at (803) 345-4392 at your convenience.

Very truly yours,

John L. Skolds

MWG:JLS:lcd
Enclosures

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PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP 900004-2
VIRGIL C. SUMMER NUCLEAR STATION

DESCRIPTION AND SAFETY EVALUATION
TS 6.4 TRAINING

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS TS to revise TS 6.4, "Training," to reflect that its training programs, INPO accredited and based on the systems approach to training, meet the requirements of Section 5.5.2 of ANSI 3.1, 1981, for non-licensed unit staff, and 10 CFR 55.59 (c) and 55.31 (a)(4) for licensed personnel. Title 10, CFR 55.31 and 55.59, allows licensees to use accredited training and requalification programs. NUREG 1262, Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses, asserts that an INPO accredited program does not constitute a decrease in the scope, content, or frequency of requalification training programs.

SAFETY EVALUATION

VCSNS has substituted its initial and requalification training programs, previously approved by the NRC, with INPO accredited training programs. The training programs are enhanced by the use of the systems approach to training. These programs implement the INPO Guidelines for Continuing Training of Licensed Personnel - INPO 86-025.

The proposed change is administrative in nature because the change merely provides clarification on the scope of the training and qualification programs, corrects the reference to ANSI 3.1, and incorporates the revised regulation in 10CFR55.

The proposed change does not alter the plant configuration and requirements, method and manner of plant operation, or affect any technical specification margin of safety.

Therefore, this amendment request does not adversely affect or endanger the health or safety of the general public and does not involve an unreviewed safety question.

PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP 900004-2
VIRGIL C. SUMMER NUCLEAR STATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided certain examples (51 FR 7744) of actions likely to involve no significant hazards considerations. The proposed amendment to section 6.4 is consistent with example (i) which states, "A purely administrative change to TS: for example, a change to achieve consistency, etc.," and example (vii) which states, "A change to make a license conform to changes in the regulations," SCE&G has determined that a no significant hazards consideration is justified and that should this request be implemented it will not:

1. Involve a significant increase in the probability or consequences of any accident previously evaluated because no plant equipment has been changed. This amendment is an administrative change involving the clarification on the scope of the training and qualification programs, corrects the reference to ANSI 3.1, and incorporates the revised regulation in 10CFR55.
2. Create the possibility of a new or different kind of accident from any previously evaluated because the proposed amendment is administrative in nature. No physical plant configuration, setpoint, or operation changes are proposed.
3. Involve a significant reduction in a margin of safety because this amendment is administrative in nature and does not affect any TS margin of safety.