SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764 COLUMBIA, SOUTH CAROLINA 29218

O. W. DIXON, JR. VICE PRESIDENT NUCLEAR OPERATIONS

May 22, 1984

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Operating License No. NPF-12 Operator Regualification Program

Dear Mr. Denton:

In accordance with the provisions of lOCFR50.54(i-1), South Carolina Electric and Gas Company (SCE&G) requests an amendment to the Operator Requalification Program which will provide for the review of abnormal and emergency procedures on an annual instead of biannual basis. SCE&G, in the Final Safety Analysis Report (FSAR), committed to perform a review of abnormal and emergency procedures on a biannual basis.

Recently, SCE&G installed and placed into service a plant-specific simulator. The simulator provides the means for an indepth review of the abnormal and emergency procedures and enhances our capability to ensure that an adequate level of familiarity with these procedures is maintained by licensed personnel.

A review of applicable documentation (Standard Review Plan, Safety Evaluation Report, Regulatory Guide 1.8, NUREG-0737 and ANSI N18.1-1971) indicated a lack of guidance pertaining to the frequency with which a review of abnormal and emergency procedures should be performed. These documents only stated that it is appropriate that a periodic review be included in the requalification training program for licensed personnel. SCE&G, in an effort to evaluate industry practice, made an inquiry about the frequency of abnormal and emergency procedure reviews at an April 17-18, 1984, Region II Training Association meeting. The results of the inquiry indicated that an annual review of abnormal and emergency procedures is consistent with current industry practice.

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Based on the depth of review achievable with the utilization of our plant-specific simulator, SCE&G is confident that an annual review is adequate to maintain a high level of familiarity with these procedures.

Should you have any questions, please call us at your convenience.

Very truly yours, you O. W. Dixon, Jr.

WRM/OWD/gj

CC:	V. C.	Summer
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