## SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

May 23, 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 Installation of P-9 Interlock

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) hereby requests a revision to the Virgil C. Summer Nuclear Station Technical Specifications to allow for the installation of an interlock to prevent a direct reactor trip following a turbine trip at or below 50% reactor power. This P-9 Interlock, designed by Westinghouse Corporation, will prevent needless challenges to the Reactor Protection System and the initiation of unnecessary transients to the Reactor Coolant System during startup of the reactor. Please find enclosed ten (10) copies of the analysis that supports the proposed modification and the associated Technical Specification changes.

As shown in the attached analysis, implementation of the P-9 interlock modification is possible since the Virgil C. Summer Nuclear Station is designed for full load rejection with 85% steam dump capability. The results of this analysis show that the Virgil C. Summer Nuclear Station design can accommodate a turbine trip without an immediate reactor trip and will not jeopardize the integrity of the reactor coolant system or the main steam system. This analysis also demonstrates that the modification is not expected to significantly increase the probability of a small break LOCA due to a stuck-open Power Operated Relief Valve.

SCE&G has determined that a finding of no significant hazards is justified based on the attached analysis and because pressure relieving devices incorporated in the Virgil C. Summer Nuclear Station main steam system are adequate to limit maximum expected pressures to within the design limits.

The Technical Specification changes have been reviewed and approved by both the Plant Safety Review Committee (PSRC) and the Nuclear Safety Review Committee (NSRC). A check in the amount of Four Thousand Dollars (\$4000.00) is enclosed for processing the change.

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SCE&G's current plans project the installation of this modification during the first refueling outage scheduled for September 1984. To support this schedule, a high priority review by the NRC Staff and an expeditious response to any Staff questions by the Licensee is essential.

If there are any questions, please advise.

Very truly yours,

O. W. Dixon, Jr.

AMM:OWD/gj Enclosure

cc: V. C. Summer T. C. Nichols, Jr./O. W. Dixon, Jr. E. H. Crews, Jr. E. C. Roberts W. A. Williams, Jr. D. A. Nauman J. P. O'Reilly Group Managers O. S. Bradham C. A. Price C. L. Ligon (NSRC) K. E. Nodland R. A. Stough G. Percival C. W. Hehl J. B. Knotts, Jr. H. G. Shealy NPCF File