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Nuclear Operations

February 21, 1992

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Mr. G. F. Wunder

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
POSITION ON DIESEL GENERATOR (DG)
STARTING AIR SYSTEM

As a result of a self-assessment, in preparation for the Electrical Distribution System Functional Inspection, South Carolina Electric & Gas Company (SCE&G) has found a discrepancy between its records and the Safety Evaluation Report (SER), NUREG-0717, issued February 1981, relative to the design of the starting air system for the emergency diesel generator(s). The SER states that "Each emergency DG has an independent and redundant air starting system consisting of two full capacity air starting subsystems, each with sufficient air capacity to provide a minimum of five consecutive cold engine starts." The SER also indicates that the basis for the acceptance was, among other criteria, in conformance to the design criteria of section 9.5.6 of the Standard Review Plan (SRP) and recommendations of NUREG/CR-0660, issued in February 1979.

Contrary to this, SCE&G licensing submittals (i.e., Final Safety Analysis Report, Section 9.5.6) and engineering and design records indicate that each DG is provided with two independent air starting systems, one for each bank of cylinders. The DG procurement specification required the air storage system to have sufficient capacity to permit five successive starts without recharging. This procurement specification was issued for bidding in March 1974, and was released for purchase in March 1975. This procurement specification precedes the issuance of the SRP.

It is SCE&G's position that the starting air system meets the recommendations of Regulatory Guide (RG) 1.9 and RG 1.108 position C.2.a and C.2.b, except for item C.2.a (7) which is not applicable to VCSNS, as committed in the Final Safety Analysis Report. VCSNS meets the intent of the acceptance criteria of Rev.2, July 1981, of Standard Review Plan 9.5.6. Factory testing of the DG demonstrated that the starting air system was capable of cranking and starting the engine and achieving full rated speed and voltage, without recharging the air tanks for ten consecutive starts. The testing exceeded the requirement of cranking the engine for five times without recharging the receivers, the cranking cycle duration of three seconds, and the two to three engine revolution required by the SRP.

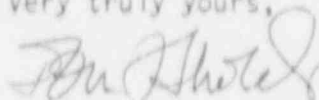
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If you have any questions concerning this matter, please contact Mr. Manuel Gutierrez at (803)345-4392.

Very truly yours,



John L. Skolds

MWG:JLS:lcd

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