

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

December 14, 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  
Fuel Handling Building  
Ventilation System

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) hereby requests a revision to the Virgil C. Summer Nuclear Station Technical Specification 3/4.9.11, "Spent Fuel Pool Ventilation System." This proposed change modifies the statement of applicability and the surveillance requirement as shown on Attachment I to make the Technical Specification require certain surveillance testing only when the system is being used in an Engineered Safety Features (ESF) function.

The Spent Fuel Pool Ventilation System at the Virgil C. Summer Nuclear Station has two (2) distinct functions. These functions consist of being an ESF system to mitigate the offsite radiological consequences of a fuel handling accident and providing a filtration/ventilation system for the fuel handling building, hot machine shop and excess liquid radwaste area during normal plant operation. The usual operating function of providing filtration for the above listed areas represents a portion of SCE&G's commitment to ALARA, and is not required to meet 10CFR100 criteria. The proposed change recognizes that during periods of normal plant operation, the testing requirements are most properly outlined by Regulatory Guide 1.140, "Design, Testing, and Maintenance Criteria for Normal Ventilation Exhaust System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants." The requested revision to the Technical Specifications does not decrease the protection of the public in the event of a design basis fuel handling accident because the Technical Specifications continue to insure that the rigorous testing requirements of Regulatory Guide 1.52, Revision 2, March 1978, "Design, Testing and Maintenance Criteria for Post Accident

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Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants," as committed to by SCE&G, are completed prior to and during use of the system for its ESF function.

SCE&G has determined that a finding of no significant hazards is appropriate. This request will not involve a significant increase in the probability or consequences of an accident previously evaluated because the system design will not change and will continue to be tested for operability before it is relied upon as an ESF system. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because the system will be tested to ensure that it continues to perform its ESF function as originally intended. Furthermore, the amendment will not involve a significant reduction in a margin of safety because SCE&G will continue to demonstrate operability of the system by performing the required surveillance activities before allowing it to serve as an ESF system.

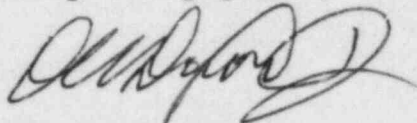
This amendment request does not change the types of effluents or significantly increase the amounts of any effluents that could be released offsite. The filters will remain in place and will operate in accordance with Technical Specification 3.11.2.4 throughout all plant modes. In addition, they will be tested for operability prior to performing an ESF function. Therefore, in the event of a postulated fuel handling accident, the amount of effluents that could be released to the environment does not change from the present licensing basis analysis. The individual or cumulative occupational radiation exposure is not increased because the request does not change the resulting exposure after a postulated fuel handling accident and because there is not any significant occupational exposure associated with the filtration system during normal plant operation.

This change has been reviewed and approved by both the Plant Safety Review Committee and the Nuclear Safety Review Committee. A check in the amount of one hundred fifty dollars (\$150.00) is enclosed to initiate the processing of this request.

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If you have any questions, please advise.

Very truly yours,



O. W. Dixon, Jr.

AMM/OWD/gj

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