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October 1, 1992

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Mr. S. D. Ebnetter  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W.  
Atlanta, GA 30342

Dear Mr. Ebnetter:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
RADIATION EMERGENCY PLAN FIRE FIGHTING SUPPORT

South Carolina Electric & Gas Company (SCE&G) proposes to initiate changes to the Virgil C. Summer Nuclear Station (VCSNS) Radiation Emergency Plan which will decrease the number of fire fighting companies currently listed in the plan. This change is being initiated so that improvements in training and quality of response can be made for the local fire fighting companies which would normally be expected to supplement the plant fire brigade.

The plan currently reflects letters of agreement from seven (7) fire fighting companies. SCE&G is recommending that the plan be changed to reflect only three (3) companies. Classroom training on plant emergency response is provided each year to the seven (7) companies. Three (3) of the companies participate in an annual fire drill on a rotating basis. The rotation cycle results in drill participation every 2-3 years. Therefore, this change would greatly increase skills and knowledge of plant emergency response needs by increasing the drill participation frequency for the three (3) local fire fighting companies.

Discussions between VCSNS Emergency Planning personnel and Region II inspector Mr. A. Gooden tentatively concluded that the proposed change could be a decrease in the effectiveness of the Radiation Emergency Plan. However, subsequent review by SCE&G has concluded that the aforementioned change will actually improve the knowledge and support provided by the local fire fighting companies and therefore, should not be considered a decrease in effectiveness. Additional support for the conclusion that response by the three (3) fire companies will provide adequate support for VCSNS is

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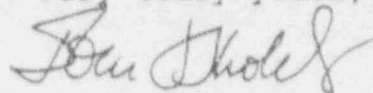
reflected by the below quote from the Fire Protection Evaluation Reports' point-by-point comparison to NRC Branch Technical Position APCS 9.5-1 Appendix A.

"Virgil C. Summer Nuclear Station is designed to be self-sufficient with respect to fire fighting activities. The plant does have agreements with local fire departments ensuring that they will respond to a fire emergency. Response from these departments is intended for supplemental or backup capability only."

Due to the tentative and conflicting conclusions previously reached by NRC and VCSNS personnel on this issue, SCE&G requests that the proposed change to the Radiation Emergency Plan be reviewed and approved by the NRC prior to implementation. As noted above, SCE&G considers the proposed change to be an enhancement of the plan and not a decrease in effectiveness as addressed in 10 CFR 50.54(q).

Should you have any questions, please contact Mr. Charles McKinney at (803) 345-4723.

Very truly yours,



John L. Skolds

CJM:cjm

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