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ABSTRACT (Limit to 1400 spaces | e approximately fifteen single space typewritten lines) (16)

XX YES III yes complete EXPECTED SUBMISSION DATE!

SUPPLEMENTAL REPORT EXPECTED (14)

While investigating an event associated with Radiation Monitor RM-A4 (Reactor Building Purge Exhaust Atmospheric Monitor) it was identified that the plant design may not satisfy the intent of Technical Specification 3.3.2, "Engineered Safety Feature Actuation System Instrumentation." This specification requires a minimum of two (2) operable radiation monitoring channels to provide containment purge valve isolation on high containment radiation during Modes 1, 2, 3, and 4. In certain plant configurations, one of the available radiation monitors is isolated and cannot sample the containment atmosphere. The Licensee is currently reviewing plant design and Technical Specifications for adequacy.

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TEXT (If more space) is required, use additional NRC Form 3664's) (17)

During September 1984, the Reactor Building 6" mini-purge supply fan was operated on several occasions while in Mode 1 to increase containment pressure to comply with Technical Specification limits. Radiation Monitor RM-A4 (Reactor Building Purge Exhaust Atmospheric Monitor) had been declared inoperable on August 28, 1994, due to erratic sampling flow problems and remained inoperable throughout the period mentioned above. The Licensee determined these events to be reportable in accordance with 10CFR50.73 because less than the required minimum channels were operable as required by Technical Specification 3.3.2, Table 3.3.3, Item 3.c.2.

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While in the process of investigating the details of the resulting report, it was identified that 1 of the 2 radiation monitoring channels presently available to satisfy Technical Specification 3.3.2 may not actually satisfy the intent of the specification. Specifically, Technical Specification 3.3.2, "Engineered Safety Feature Actuation System Instrumentation," applies to the Reactor Building Purge Supply and Exhaust System. Technical Specification 3.3.2 requires a minimum of 2 operable radiation monitoring channels to provide containment isolation for the Reactor Building Purge and Exhaust System on a high containment activity signal. The available channels to satisfy this specification are RM-A2, which samples the containment atmosphere directly, and RM-A4, which samples the combined 36" purge and 6" mini-purge exhaust from the Reactor Building downstream of the isolation valves for each purge exhaust system.

The 6" mini-purge system is the only Reactor Building purge system that can be used in Modes 1, 2, 3, and 4 in accordance with Technical Specification 3.6.1.7, "Containment Ventilation System." When the minipurge exhaust system is isolated, RM-A4 cannot receive a containment air sample to provide the necessary closure signal. This condition exists during the relatively infrequent but necessary operation of running only the mini-purge supply system for containment pressurization.

The Licensee has initiated the following corrective actions:

- RM-A4 has been returned to service subsequent to repair and successful surveillance testing.
- The Technical Specifications and plant design for RM-A4 are being 2) further evaluated for compatibility. Final corrective action will be determined upon completion of the evaluation.
- The Reactor Building Purge and Exhaust System will not be utilized for Reactor Building pressurization until completion of the corrective action determined in Item 2 above.

## SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

AID: 24

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

34 NOV 6

October 26, 1984

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

SUBJECT: Virgil C. Summer Nuclear Station

Docket No. 50/395

Operating License No. NPF-12

LER 84-042

Dear Sir:

Attached is Licensee Event Report #84-042 for the Virgil C. Summer Nuclear Station. This Report is submitted pursuant to the requirements of 10CFR50.73(a)(2)(i).

Should there be any questions, please call us at your convenience.

Very truly yours,

O. W. Dixon or.

HCF:OWD/lcd Attachment

cc: V. C. Summer

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