

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 784

COLUMBIA, SOUTH CAROLINA 29218

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

April 4, 1985

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
Unit Staff Overtime

Dear Mr. Denton:

Section 6.2.2.f of the Technical Specifications for the Virgil C. Summer Nuclear Station discusses overtime limitations for unit staff that performs safety-related functions. This Technical Specification provides guidelines to be followed in the event substantial use of overtime is required. This letter is being provided to clarify South Carolina Electric and Gas Company's (SCE&G) interpretation of sub-section 6.2.2.f.d of the Technical Specifications.

As noted in sub-section 6.2.2.f.d, overtime is to be considered on an individual basis except during extended shutdown periods. During these occasional extended outages, the Director, Nuclear Plant Operations, his deputy, or a higher level of management can authorize a work-group to deviate from the overtime guidelines in Technical Specification 6.2.2.f to support the necessary workload during the outage.

The Director, Nuclear Plant Operations, or his designee, reviews a monthly overtime deviation report which lists the authorized work-group overtime deviations. This report must indicate authorized deviations for each applicable work-group and whether the authorization was obtained prior to actually exceeding the limitations. The individuals within the work-groups who actually deviate are not required to be listed on the monthly report if their workgroup is authorized to exceed the overtime guidelines. This practice enables management to review the number of overtime deviations being authorized and to assess the effectiveness of SCEAG's administrative controls used to assure personnel do not exceed the Technical Specification guidelines without prior management review and approval.

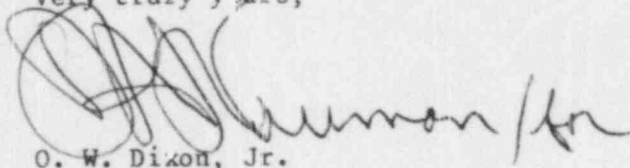
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If you have any questions, please advise.

Very truly yours,

A handwritten signature in cursive script, appearing to read "O. W. Dixon, Jr.", written over a large, circular scribble.

O. W. Dixon, Jr.

AMM/OWD:gj
Attachment:

cc: V. C. Summer	C. A. Price
T. C. Nichols, Jr./O. W. Dixon, Jr.	C. L. Ligon (NSRC)
E. H. Crews, Jr.	K. E. Nodland
E. C. Roberts	R. A. Stough
W. A. Williams, Jr.	G. Percival
D. A. Nauman	C. W. Hehl
J. N. Grace	J. B. Knotts, Jr.
Group Managers	NPCF
O. S. Bradham	File