

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

October 11, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Generic Letter 85-06
Non-Safety-Related ATWS Equipment

Dear Mr. Denton:

On June 1, 1984, the Commission approved publication of the final rule (10CFR50.62) regarding the reduction of risk from anticipated transients without scram (ATWS) events for light-water cooled nuclear power plants. This rule required licensees to develop and submit to the Director of the Office of Nuclear Reactor Regulation a proposed schedule for meeting the requirements of the rule within 180 days after issuance of NRC Staff quality assurance (QA) guidance for non-safety-related equipment encompassed by the ATWS rule. On April 16, 1985, the NRC Staff issued Generic Letter 85-06, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety-Related," thus initiating the schedule contained in 10CFR50.62. The purpose of this letter is to provide South Carolina Electric and Gas Company's (SCE&G) proposed schedule for meeting the requirements of the ATWS rule as it applies to the Virgil C. Summer Nuclear Station.

In a letter from L.D. Butterfield to C.O. Thomas dated July 25, 1985, the Westinghouse Owners Group (WOG) submitted Topical Report WCAP-10858, "AMSAC Generic Design Package," which describes three conceptual designs that meet the requirements found in 10CFR50.62. This requirement is to have equipment from sensor output to final actuation device, that is diverse from the reactor trip system, to automatically initiate the auxiliary feedwater system and to initiate a turbine trip under conditions indicative of an ATWS. SCE&G is a member of the WOG and participated in the development of this WCAP. SCE&G's selection of a final design from one of these three conceptual designs will depend on the NRC's approval of WCAP-10858.

The proposed schedule for implementation of the ATWS rule is based in part upon the completion of the NRC Staff's review of the WOG AMSAC generic design package. A time period of approximately eighteen (18) months will be necessary following receipt of the NRC Safety Evaluation Report (SER) to allow for both detailed plant specific design of the system (approximately six months) and procurement of materials (approximately 12 months). This proposed schedule assumes that the NRC Staff does not require a plant specific design review prior to implementation of the design at the Virgil C. Summer Nuclear Station. SCE&G will submit a description of the final design and final implementation schedule within six months of receipt of the SER. Currently SCE&G expects that the

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system could be installed during the first scheduled refueling outage after the above described 18 month period. This schedule will put final implementation beyond the date outlined in 10CFR50.62; however, without NRC Staff approval and issuance of the supporting SER, SCE&G is unable to provide a schedule which supports the rule.

If you should have any questions or request additional information, please contact us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

AMM:OWD:tdh

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