



South Carolina Electric & Gas Company  
P.O. Box 764  
Columbia, SC 29218  
(803) 748-3000

April 1, 1986

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  
APPENDIX R REANALYSIS

Dear Mr. Denton:

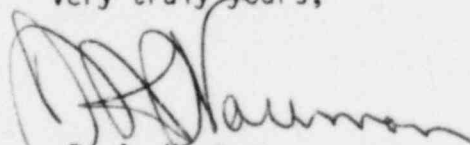
This letter is being written to provide additional clarification of the South Carolina Electric and Gas Company (SCE&G) position on the issue of local control switches. In particular, it concerns a request by the staff to clarify the use or lack of use of local control switches for hot standby equipment.

Our letter of May 29, 1985 on page I-7 provided a then current estimate of the equipment that potentially required fire switches. Based on concerns raised in Audit Report 50-395/85-26 and questions raised during a meeting between SCE&G and both NRR and Region II, SCE&G submitted an initial clarification as part of our September 4, 1985 submittal to your office.

Section 5.0 of that submittal was our attempt to delineate the need for and basis for the addition of fire switches. Table 5.3 and its associated notes provided in summary form, the extent of proposed modifications and the extent of the use of jumper procedures.

By way of clarification, it is SCE&G's intention to install local control fire switches on Train "B" equipment if this equipment is needed for entry into or maintenance of hot standby. Local jumper procedures are utilized for cold shutdown equipment. Five cooling fans fall into a gray area. These fans which were identified in Table 5.3 with explanatory note 3 could strictly be considered necessary for maintenance of hot standby, if hot standby were to be maintained indefinitely. However, their function, if lost due to a fire, would not need to be restored for in excess of eight hours. Because of the extreme simplicity of the proposed control jumper procedures and the time available for implementation, SCE&G considers these repairs to be reasonable and not to violate the intent of NRC guidance on repair of hot standby equipment.

Very truly yours,



D. A. Nauman

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cc: V. C. Summer  
O. W. Dixon, Jr./T. C. Nichols, Jr.  
E. H. Crews, Jr.  
E. C. Roberts  
J. G. Connelly, Jr.  
W. A. Williams, Jr.  
J. Nelson Grace  
Group Managers  
O. S. Bradham  
D. R. Moore  
C. A. Price  
C. L. Ligon (NSRC)  
R. M. Campbell  
K. E. Nodland  
G. O. Percival  
R. L. Prevatte  
J. B. Knotts, Jr.  
H. G. Shealy  
NPCF  
File