



South Carolina Electric & Gas Company  
Virgil C. Summer Nuclear Station  
P.O. Box 88  
Jenkinsville, SC 29065  
(803) 345-5209  
(803) 634-2011

July 18, 1988

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

Subject: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
Operating License No. NPF-12  
Technical Specifications  
Organizational Title Changes

Gentlemen:

South Carolina Electric & Gas Company (SCE&G) hereby requests a revision to the Technical Specifications. The proposed revision to Section 6.0 (Attachment I) reflects two organizational title changes which have been previously discussed with the staff. This revision also includes an updated Page 6-5 (Attachment III) related to the July 6, 1987 submittal for which the Safety Hazards Consideration does not change.

Attachment I provides the Safety Hazards Consideration pursuant to 10CFR50.91(a)(1). This request has been reviewed and approved by the Plant Safety Review Committee and the Nuclear Safety Review Committee. A check in the amount of one hundred fifty dollars (\$150.00) is enclosed for processing this change.

I declare the statements and matters set forth herein are true and correct to the best of my knowledge, information and belief.

Should you have any questions, please contact us at your convenience.

Very truly yours,

O. S. Bradham  
Vice President,  
Nuclear Operations

HID/OSB:bgh

Attachments

c: Page 2

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c: J. G. Connelly, Jr./O. W. Dixon, Jr./T. C. Nichols, Jr.  
D. A. Nauman  
E. C. Roberts  
W. A. Williams, Jr.  
J. N. Grace  
J. J. Hayes, Jr.  
General Managers  
C. A. Price  
R. B. Clary  
W. R. Higgins  
R. M. Campbell, Jr.  
K. E. Nodland  
J. C. Snelson  
G. O. Percival  
R. L. Prevatte  
J. B. Knotts, Jr.  
H. G. Shealy  
NSRC  
RTS  
NPCF  
File (813.20)

### SAFETY HAZARDS CONSIDERATION

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the organizational title changes do not affect plant operation in any manner.
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed changes are administrative in nature and do not affect organizational responsibilities. Also, no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.
3. The proposed amendment does not involve a significant reduction in a margin of safety. Through SCE&G's Quality Assurance programs and efforts to maintain only the most qualified personnel in positions of responsibility, it is assured that safety functions performed by personnel within the Nuclear Operations Division will continue to be performed at a high level of competence.

Based on the above reasoning, SCE&G has determined that the proposed amendment does not involve a significant hazards consideration.