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Dan A. Nauman
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May 16, 1988

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

Attention: Mr. John J. Hayes

Subject: Virgil C. Summer Nuclear Station
 Docket No. 50/395
 Operating License No. NPF-12
 Diesel Generator Testing

- Reference: (1) Mr. D. A. Nauman letter to Mr. Harold Denton
 dated December 6, 1985
 (2) Mr. Jon B. Hopkins letter to Mr. D. A. Nauman
 dated November 9, 1987

Dear Mr. Hayes:

In a letter from Mr. D. A. Nauman to Mr. H. R. Denton dated December 6, 1985, Reference 1, South Carolina Electric & Gas Company (SCE&G) requested changes to the Virgil C. Summer Nuclear Station Technical Specifications which were intended to reduce the number and severity of starts of the emergency diesel generators, thereby decreasing engine wear and increasing reliability. In a letter from Mr. Jon B. Hopkins to Mr. D. A. Nauman dated November 9, 1987, Reference 2, the NRC Staff requested additional information for the change requested. This letter is being supplied in response to that request for information (see Enclosure).

The additional Technical Specification changes included in this letter have been reviewed and approved by both the Plant Safety Review Committee and the Nuclear Safety Review Committee.

If you should have any further questions, please advise.

Very truly yours,

D. A. Nauman
 D. A. Nauman

RJB:DAN:lcd
 Enclosure

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ENCLOSURE

Statement 1 To action statement b.1 of Technical Specification (TS) 3.8.1.1, the following statement may be added: "If the EDG became inoperable due to any cause other than preplanned preventative maintenance." The optional statement was previously approved by the NRC staff in the North Anna TS and will help reduce the number of unnecessary starts.

Response: The statement, "If the EDG became inoperable due to any cause other than preplanned preventative maintenance," has been added to action statement b.2. SCE&G will still require that action statement b.1. be performed regardless of the reason the EDG is rendered inoperable.

Statement 2 To action statements b.2 and c.2 of TS 3.8.1.1, a footnote should be added that states that, "This test is required to be completed regardless of when the inoperable EDG is restored." This footnote is necessary to make sure that, when one EDG is inoperable, the redundant EDG is tested to ensure no common mode failure has occurred that affected both EDGs. This footnote was approved by the NRC staff for the North Anna TS. Therefore, add the footnote or explain its absence.

Response: The footnote has been added to action statements b.2. and c.2. of TS 3.8.1.1.

Statement 3 Surveillance requirements 4.8.1.1.1.b and 4.8.1.1.2.e should remain at a frequency of once every 18 months. The change to once every refueling is a generic change that is being evaluated by the NRC staff independent of this TS surveillance by the NRC staff. Therefore, retain the original frequency or further justify your proposed change.

Response: The frequency has been changed to once every 18 months.

Statement 4 The NRC staff's view is that a loading band of 4150-4250 kw is sufficient to avoid routine overloading of the EDG, and that the proposed loading band of 3900-4100 kw deviates too far from the continuous load rating of 4250 kw. Furthermore, the maximum load under loss of offsite power conditions is calculated to be 4441 kw. Therefore, the proposed loading band should be further explained or changed.

Response: The loading band has been changed to 4150-4250 kw.

Statement 5 TS 4.8.1.1.2.e.6.c

The NRC staff's view is that the original wording of "concurrent with" should be retained instead of the proposed wording of "and/or." Regulatory Guide 1.9 says that these trips should be bypassed on an accident signal, and it is during an accident with loss of offsite power that the loss of an EDG is least tolerable, since time to get water to the reactor vessel may be critical. It is this mode that should be tested. Therefore, the proposed wording should be changed or explained.

Response: The proposed wording of "and/or" has been replaced with the original wording of "concurrent with."

Statement 6: TS 4.8.1.1.2.e.7.a

The two hour loading at the short time rating should be retained at the beginning of the test in accordance with position C.14 of Regulatory Guide 1.9. The NRC staff's view is that this is especially necessary at Summer because the maximum load under loss of offsite power conditions is 4441 kw which is into the short time rating and will likely occur at the beginning of the event. Therefore, you should further explain your position or change it.

Response: The two hour loading at the short time rating short is now required at the beginning of the test in accordance with position C.14 of Regulatory Guide 1.9.

Statement 7: The NRC staff's view is that the original reporting requirements should be retained. Therefore, you should further explain the proposed wording or change it. Also, the NRC staff believes that the correct TS number is 4.8.1.1.3.

Response: The original reporting requirements will be retained.

Statement 8: TS 4.8.1.2

The NRC staff's view is that the reporting requirements of TS 4.8.1.1.3 should be retained in TS 4.8.1.2. Therefore, you should further explain this deletion or change it.

Response: The reporting requirement has been changed to TS 4.8.1.1.3.