

Official

MAY 16 1986

South Carolina Electric and Gas Company
ATTN: ✓ Mr. D. A. Nauman, Vice President
Nuclear Operations
P. O. Box 764 (167)
Columbia, SC 29218

Gentlemen:

SUBJECT: V. C. SUMMER NUCLEAR STATION RADIOLOGICAL EMERGENCY PLAN REVIEW,
DOCKET NO. 50-395

We have completed a preliminary review of Revision 15 to the V. C. Summer Radiological Emergency Plan (REP).

Our review indicated that certain changes involving the classification scheme are not clearly consistent with the provisions of 10 CFR 50.47(b), NUREG-0654, Appendix 1. The inconsistencies in the Plan changes are specified in the enclosure.

Other items involving the event classification scheme are unresolved at this time and evaluation of the rationale for downgrading the classification of several accidents is continuing to determine consistency with applicable regulations. The results of that review will be forwarded to you as soon as possible.

To preclude a violation of regulatory requirements, you must not continue to implement the changes deemed inconsistent and identified in the enclosure to this letter. Please modify your plan to correct those pages necessary to maintain plan continuity. We request that these corrections be provided to us within 45 days of the date of this letter.

Should there be further questions or discussions regarding this matter, please contact Mr. Thomas R. Decker of our staff at 404-331-2600.

Sincerely,

Original Signed by
Luis A. Reyes

Luis A. Reyes, Acting Director
Division of Reactor Projects

Enclosure:
Inconsistencies in Plan

cc w/encl: (See page 2)

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cc w/encl:

- ✓ O. S. Bradham, Director
Nuclear Operations
- ✓ J. L. Skolds, Deputy Director
Operations and Maintenance
- ✓ A. M. Paglia, Jr., Manager
Nuclear Licensing
- ✓ J. P. Harrison, Manager
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bcc w/encl:

- ✓ NRC Resident Inspector
- ✓ Document Control Desk
- ✓ State of South Carolina
EP Section Files
- ✓ J. Hopkins, NRR

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ENCLOSURE

INCONSISTENCIES IN PLAN

1. Section 4.0, Table 4-1, Page 29: As an initiating condition, the loss of all annunciator alarms leading to the Notification of Unusual Event (NOUE) is inconsistent with NUREG-0654, Appendix 1, Page 1-9, Item 14, which states "most or all alarms (annunciators) lost" as an initiating condition for the Alert classification.
2. Section 4.0, Table 4-1, Page 29: The NOUE classification based on the loss of all onsite D-C power for a period greater than 5 minutes, is inconsistent with NUREG-0654, Appendix 1, Page 1-9, Item 8, which states "loss of all onsite DC power" as an initiating condition for the Alert classification.
3. Section 4.0, Table 4-3, Page 32F: The initiating condition for the alert classification involving the loss of offsite power and loss of all onsite AC power was not included in this table. This change is inconsistent with NUREG-0654, Appendix 1, Page 1-9, Item 7.
4. Section 6.0, Table 6-3, Page 61K: The protective action recommendations table is inconsistent with 10 CFR 50.47(b)(10), NUREG-0654/FEMA-REP-1, Appendix 1, and further explained in IE Information Notice No. 83-28, "Criteria For Protective Action Recommendations For General Emergencies." Table 6-3 does not direct the user to promptly provide offsite authorities with a minimum protective action recommendation of shelter 2 miles radius and 5 miles downwind following the declaration of a General Emergency. In addition, no reference is made to a General Emergency being declared due to loss of physical control of the plant to intruders.