



South Carolina Electric & Gas Company  
P.O. Box 88  
Jenkinsville, SC 29065  
(803) 345-4040

Ollie S. Bradham  
Vice President  
Nuclear Operations

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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 Change  
Reactor Trip Breaker Testing

Gentlemen:

In a letter dated January 20, 1989, South Carolina Electric & Gas Company requested changes to the Technical Specifications pursuant to Generic Letter 85-09, "Technical Specifications for Generic Letter 83-28". Subsequently in review of our submittal, the staff requested an expanded no significant hazards evaluation. This evaluation is attached.

Should you have additional questions, please call at your convenience.

Very truly yours,

O. S. Bradham

MDB/OSB:mrg  
Attachment

c: D. A. Nauman/O. W. Dixon, Jr./T. C. Nichols, Jr.  
E. C. Roberts  
W. A. Williams, Jr.  
S. D. Ebnetter  
J. J. Hayes, Jr.  
General Managers  
C. A. Price/R. M. Campbell, Jr.  
R. B. Clary  
K. E. Nodland  
J. C. Snelson  
G. O. Percival  
R. L. Prevatte  
H. G. Shealy  
J. B. Knotts, Jr.  
M. D. Blue  
NSRC  
RTS (TSP 970011)  
File (813.20)

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PDR ADOCK 05000395  
P PDC

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SIGNIFICANT HAZARDS EVALUATION  
FOR VIRGIL C. SUMMER NUCLEAR STATION REACTOR TRIP BREAKERS

***Description of amendment request:***

The proposed amendment revises Table 3.3-1, "Reactor Trip System Instrumentation," to incorporate an additional action statement which will allow continued plant operation for up to 48 hours with one of the diverse trip features inoperable before further action is required. In addition, Table 4.3-1, "Reactor Trip System Instrumentation Surveillance Requirements," is being revised to require the independent testing of the diverse trip features during power operation and the control room manual switch contacts during each refueling.

***Basis for proposed no significant hazards consideration:***

On May 25, 1985, the Commission issued Generic Letter 85-09, "Technical Specifications for Generic Letter 83-28, Item 4.3." Generic Letter 83-28, Item 4.3 established the requirement for automatic actuation of the shunt trip attachment for Westinghouse plants. Later the staff concluded that Technical Specification changes should be proposed to explicitly require independent testing of the undervoltage and shunt trip attachments during power operation and independent testing of the control room manual switch contacts during each refueling outage.

The proposed changes to Tables 3.3-1 and 4.3-1 add additional limitations and restrictions required to implement the staff's objectives in Generic Letter 85-09.

The Commission has provided certain examples (51 FR 7744) of actions likely to involve no significant hazards considerations. The request involved in this case matches example (ii), a change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications. Furthermore, the proposed amendment meets the requirements of Generic Letter 85-09; therefore, the Licensee has determined that a no significant hazards evaluation is justified and that should this request be implemented it will not:

- 1) Involve a significant increase in the probability or consequences of any accident previously evaluated because no plant equipment has been changed. This proposed change adds additional testing requirements to the reactor trip breakers.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the additional testing is necessary to ensure the continued reliable reactor trip breaker operation.
- 3) Involve a significant reduction in a margin of safety because only additional testing of the reactor trip breakers is proposed.