Stephen A. Byrne
Vice President, Nuclear Operations
803.345.4622

SCE&G®
A SCANA COMPANY

April 18, 2001
RC-01-0082

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

Attention: K. R. Cotton

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
TECHNICAL SPECIFICATION CHANGE REQUEST (TSP 00-0041)
REVISION OF VENTILATION SYSTEM AIR FLOW VELOCITY UNITS

South Carolina Electric and Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) in accordance with 10CFR50.90. This proposed amendment will revise volumetric air flow units for 4.7.6.c.1, c.3, e.1, e.3, f to identify standard air flow units expressed as SCFM. Volumetric air flow units for TS 4.6.3.b.1, b.2, c.1, d, g, TS 4.9.11.b.1, b.3, d.1, e, f are being revised to identify actual air flow units and are expressed as ACFM.

Design air flow is typically based on air at standard conditions. Volumetric air flows measured for the surveillances of TS 4.7.6 are converted for air density changes and expressed in SCFM. The existing nomenclature of CFM does not present this information adequately. Volumetric air flows measured for TS 4.6.3 and TS 4.9.11 are expressed in ACFM due to their specific design application.

No change to the Bases section is required.

The amendment request is contained in the following documents:

Attachment I	Explanation of Changes Summary Marked-up Technical Specification Pages Revised Technical Specification Pages
Attachment II	Safety Evaluation
Attachment III	No Significant Hazards Determination
Attachment IV	Environmental Impact Determination

A001

This proposed TS amendment request has been reviewed by both the Plant Safety Review Committee and the Nuclear Safety Review Committee.

SCE&G requests NRC review and approval of this change to the VCSNS TS as expeditiously as possible.

There are no other TS changes in process that will affect or be affected by this change request.

Changes to FSAR Sections 9 and 11 and FPER Section 5 to reconcile with the units will be required to be made upon approval of this proposed request.

A copy of this application and the associated attachments is being provided to the designated South Carolina state official in accordance with 10 CFR 50.91

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

Should you have questions, please call Mr. Jim Turkett at (803) 345-4047 or Mr. Frank McKinnon at (803) 345-4306.

Very truly yours,

Stephen A. Byrne

JWT/SAB/dr
Attachment(s): 4

c: N. O. Lorick
N. S. Carns
T. G. Eppink (w/o Attachment)
R. J. White
L. A. Reyes
NRC Resident Inspector
P. Ledbetter
K. W. Sutton
T. P. O'Kelley
RTS (TSP 00-0041)
File (813.20)
DMS (RC-01-0082)

STATE OF SOUTH CAROLINA :
: **TO WIT** :
COUNTY OF FAIRFIELD :

I hereby certify that on the 18th day of April, 2001, before me, the subscriber, a Notary Public of the State of South Carolina personally appeared Stephen A. Byrne, being duly sworn, and states that he is Vice President, Nuclear Operations of the South Carolina Electric & Gas Company, a corporation of the State of South Carolina, that he provides the foregoing response for the purposes therein set forth, that the statements made are true and correct to the best of his knowledge, information, and belief, and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal

Notary Public

My Commission Expires

July 13, 2005
Date

SCE&G -- EXPLANATION OF CHANGES

Page	Affected Section	Bar #	Description of Change	Reason for Change
3/4 6-15	4.6.3.b.1	1	Revise cfm to ACFM.	To identify volumetric flow units in accordance with design application.
	4.6.3.b.2	2	Revise cfm to ACFM.	To identify volumetric flow units in accordance with design application.
3/4 6-16	4.6.3.c.1	1	Revise cfm to ACFM.	To identify volumetric flow units in accordance with design application.
	4.6.3.d	2	Revise cfm to ACFM.	To identify volumetric flow units in accordance with design application.
3/4 7-15	4.7.6.c.1	1	Revise cfm to SCFM.	To identify volumetric flow in accordance with standard air conditions.
	4.7.6.c.3	2	Revise cfm to SCFM.	To identify volumetric flow in accordance with standard air conditions.
	4.7.6.e.1	3	Revise cfm to SCFM.	To identify volumetric flow in accordance with standard air conditions.

SCE&G -- EXPLANATION OF CHANGES

Page	Affected Section	Bar #	Description of Change	Reason for Change
3/4 7-15 continued	4.7.6.e.3	4	Revise cfm to SCFM.	To identify volumetric flow in accordance with standard air conditions.
	4.7.6.f	5	Revise cfm to SCFM.	To identify volumetric flow in accordance with standard air conditions.
	4.7.6.g	6	Revise cfm to SCFM.	To identify volumetric flow in accordance with standard air conditions.
3/4 9-12	4.9.11.b.1	1	Revise cfm to ACFM.	To identify volumetric flow in accordance with design application.
3/4 9-13	4.9.11.b.3	1	Revise cfm to ACFM.	To identify volumetric flow in accordance with design application.
	4.9.11.d.1	2	Revise cfm to ACFM.	To identify volumetric flow in accordance with design application.
	4.9.11.e	3	Revise cfm to ACFM.	To identify volumetric flow in accordance with design application.
	4.9.11.f	4	Revise cfm to ACFM.	To identify volumetric flow in accordance with design application

3/4.6.3 PARTICULATE IODINE CLEANUP SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.3 Two independent groups of HEPA filter banks (associated with the OPERABLE reactor building cooling units of Specification 3.6.2.3) with at least one filter bank in each group, shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one group of HEPA filter banks OPERABLE, restore one of the inoperable banks in the other group to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3 The two groups of HEPA filter banks shall be demonstrated OPERABLE:

a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and verifying that the system operates for at least 15 minutes.

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 60,270 ~~cfm~~ ACFM ± 10%.
2. Verifying a system flow rate of 60,270 ~~cfm~~ ACFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 18 months by:

1. Verifying that the pressure drop across the HEPA filters is less than 3 inches Water Gauge while operating the system at a flow rate of 60,270 ~~cfm~~ ACFM ± 10%.

2. Verifying that the filter bypass damper can be opened by operator action.

3. Verifying that the filter bypass damper closes on a Safety Injection Test Signal.

d. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ASNI N510-1975 while operating the system at a flow rate of 60,270 ~~cfm~~ ACFM ± 10%.

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 21,270 ~~cfm~~ SCFM ± 10%.

2. Verifying, within 31 days after removal, that a laboratory analysis of a representative charcoal sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 70% and 30°C with a methyl iodide penetration of <2.5%.

3. Verifying a system flow rate of 21,270 ~~cfm~~ SCFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 70% and 30°C with a methyl iodide penetration of <2.5%.

e. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA and roughing filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 21,270 ~~cfm~~ SCFM ± 10%.

2. Verifying that on a simulated SI or high radiation test signal, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.

3. Verifying that on a simulated SI or high radiation test signal the system starts the normal and emergency air handling systems which pressurize the control room to a positive pressure of greater than or equal to 1/8 inch W.G. relative to the outside atmosphere and maintains the 1/8 inch W.G. positive pressure with a maximum of 1000 ~~cfm~~ SCFM of outside air during system operation.

f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 21,270 ~~cfm~~ SCFM ± 10%.

g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 21,270 ~~cfm~~ SCFM ± 10%.

REFUELING OPERATIONS

3/4.9.11 SPENT FUEL POOL VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.11 Two independent spent fuel pool ventilation sub-systems shall be OPERABLE with at least one sub-system in operation.

APPLICABILITY: Whenever irradiated fuel is being moved in the spent fuel pool and during crane operation with loads over the pool.

ACTION:

a. With one spent fuel pool ventilation sub-system inoperable, fuel movement within the spent fuel pool or crane operation with loads over the spent fuel pool may proceed provided the OPERABLE spent fuel pool ventilation sub-system is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.

b. With no spent fuel pool ventilation sub-system OPERABLE, suspend all operations involving movement of fuel within the spent fuel pool or crane operation with loads over the spent fuel pool.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.11 The above required spent fuel pool ventilation sub-systems shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that each sub-system operates for at least 15 minutes.

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 30,000 ~~cfm~~ ACFM ± 10%.

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 95% and 30°C with a methyl iodide penetration of <2.5%.

3. Verifying a system flow rate of 30,000 ~~cfm~~ ACFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

c. Prior to the movement of fuel or crane operation with loads over the pool by verifying that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 95% and 30°C with a methyl iodide penetration of <2.5%. Subsequent to each initial analysis (which must be completed prior to fuel movement or crane operation with loads over the pool), during the period of time in which there is to be fuel or crane movement with loads over the pool, verify charcoal adsorber operation every 720 hours by obtaining and analyzing a sample as described above. These subsequent analyses are to be completed within thirty-one (31) days of sample removal.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA and roughing filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 30,000 ~~cfm~~ ACFM ± 10%.

2. Verifying that on a loss of offsite power test signal, the system automatically starts.

3. Verifying that the system maintains the spent fuel pool area at a negative pressure greater than or equal to 1/8 inches Water Gauge relative to the outside atmosphere during system operation.

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 30,000 ~~cfm~~ ACFM ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 30,000 ~~cfm~~ ACFM ± 10%.

3/4.6.3 PARTICULATE IODINE CLEANUP SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.3 Two independent groups of HEPA filter banks (associated with the OPERABLE reactor building cooling units of Specification 3.6.2.3) with at least one filter bank in each group, shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one group of HEPA filter banks OPERABLE, restore one of the inoperable banks in the other group to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3 The two groups of HEPA filter banks shall be demonstrated OPERABLE:

a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and verifying that the system operates for at least 15 minutes.

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 60,270 ACFM ± 10%.

2. Verifying a system flow rate of 60,270 ACFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

3/4.6.3 PARTICULATE IODINE CLEANUP SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.3 Two independent groups of HEPA filter banks (associated with the OPERABLE reactor building cooling units of Specification 3.6.2.3) with at least one filter bank in each group, shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one group of HEPA filter banks OPERABLE, restore one of the inoperable banks in the other group to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

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a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and verifying that the system operates for at least 15 minutes.

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 60,270 ACFM ± 10%.

2. Verifying a system flow rate of 60,270 ACFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 18 months by:

1. Verifying that the pressure drop across the HEPA filters is less than 3 inches Water Gauge while operating the system at a flow rate of 60,270 ACFM ± 10%.

2. Verifying that the filter bypass damper can be opened by operator action.

3. Verifying that the filter bypass damper closes on a Safety Injection Test Signal.

d. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ASNI N510-1975 while operating the system at a flow rate of 60,270 ACFM ± 10%.

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 21,270 SCFM ± 10%.

2. Verifying, within 31 days after removal, that a laboratory analysis of a representative charcoal sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 70% and 30°C with a methyl iodide penetration of <2.5%.

3. Verifying a system flow rate of 21,270 SCFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 70% and 30°C with a methyl iodide penetration of <2.5%.

e. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA and roughing filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 21,270 SCFM ± 10%.

2. Verifying that on a simulated SI or high radiation test signal, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.

3. Verifying that on a simulated SI or high radiation test signal the system starts the normal and emergency air handling systems which pressurize the control room to a positive pressure of greater than or equal to 1/8 inch W.G. relative to the outside atmosphere and maintains the 1/8 inch W.G. positive pressure with a maximum of 1000 SCFM of outside air during system operation.

f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 21,270 SCFM ± 10%.

g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 21,270 SCFM ± 10%.

REFUELING OPERATIONS

3/4.9.11 SPENT FUEL POOL VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.11 Two independent spent fuel pool ventilation sub-systems shall be OPERABLE with at least one sub-system in operation.

APPLICABILITY: Whenever irradiated fuel is being moved in the spent fuel pool and during crane operation with loads over the pool.

ACTION:

a. With one spent fuel pool ventilation sub-system inoperable, fuel movement within the spent fuel pool or crane operation with loads over the spent fuel pool may proceed provided the OPERABLE spent fuel pool ventilation sub-system is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.

b. With no spent fuel pool ventilation sub-system OPERABLE, suspend all operations involving movement of fuel within the spent fuel pool or crane operation with loads over the spent fuel pool.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.11 The above required spent fuel pool ventilation sub-systems shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that each sub-system operates for at least 15 minutes.

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

   1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 30,000 ACFM ± 10%.

2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 95% and 30°C with a methyl iodide penetration of <2.5%.

3. Verifying a system flow rate of 30,000 ACFM ± 10% during system operation when tested in accordance with ANSI N510-1975.

c. Prior to the movement of fuel or crane operation with loads over the pool by verifying that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, at a relative humidity of 95% and 30°C with a methyl iodide penetration of <2.5%. Subsequent to each initial analysis (which must be completed prior to fuel movement or crane operation with loads over the pool), during the period of time in which there is to be fuel or crane movement with loads over the pool, verify charcoal adsorber operation every 720 hours by obtaining and analyzing a sample as described above. These subsequent analyses are to be completed within thirty-one (31) days of sample removal.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA and roughing filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 30,000 ACFM ± 10%.

2. Verifying that on a loss of offsite power test signal, the system automatically starts.

3. Verifying that the system maintains the spent fuel pool area at a negative pressure greater than or equal to 1/8 inches Water Gauge relative to the outside atmosphere during system operation.

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 30,000 ACFM ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 30,000 ACFM ± 10%.

SAFETY EVALUATION FOR REVISING SPECIFICATION 4.6.3, 4.7.6 and 4.9.11 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

Description of Amendment Request

South Carolina Electric & Gas Company (SCE&G) proposes a change to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) Surveillance Requirements to revise the volumetric flow units for 4.7.6.c.1, c.3, e.1, e.3, f to identify standard flow units expressed as SCFM. Volumetric flow units for TS 4.6.3.b.1, b.2, c.1, d, g, TS 4.9.11.b.1, b.3, d.1, e, f are being revised to identify actual air flow units and expressed as ACFM.

Safety Evaluation

The term "cfm" is an acronym for cubic feet per minute and does not properly relate to design considerations nor does it account for the effect of air density. SCFM (Standard Cubic Feet per Minute) expresses the volume flow of air at standard conditions (i.e., 0.075 lbs/ft^3, 70 degrees F, and 29.921 inches Hg). ACFM (Actual Cubic Feet per Minute) represents the actual volume flow of air at the site temperature and pressure conditions. These terms clarify the units of air flow relating to the conditions required by the affected TS.

This proposed change does not increase the probability of the occurrence of an accident in any of the three ventilation systems represented. The change is for clarification of the volumetric air flow units appropriate to the ventilation system being addressed and is considered editorial in nature.

Thus, there is no adverse effect on equipment important to safety as a result of this change, and there is no perceived accident of a different type which could result.

Pursuant to the above information, the proposed TSCR does not involve a significant reduction in the margin of safety.

NO SIGNIFICANT HAZARDS DETERMINATION FOR REVISING SPECIFICATION 4.6.3, 4.7.6 and 4.9.11 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

Description of Amendment Request

South Carolina Electric & Gas Company (SCE&G) proposes a change to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) Surveillance Requirements to revise the volumetric flow units for 4.7.6.c.1, c.3, e.1, e.3, f to identify standard flow units expressed as SCFM. Volumetric flow units for TS 4.6.3.b.1, b.2, c.1, d, g, TS 4.9.11.b.1, b.3, d.1, e, f are being revised to identify actual air flow units and expressed as ACFM.

Basis for No Significant Hazards Consideration Determination

South Carolina Electric & Gas Company (SCE&G) has evaluated the proposed changes to the VCSNS TS described above against the significant Hazards Criteria of 10CFR50.92 and has determined that the changes do not involve any significant hazard. The following is provided in support of this conclusion.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Changes associated with the identification of proper flow units are editorial and have no impact.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Changes associated with the identification of proper flow units are editorial and have no impact.

3. Does this change involve a significant reduction in margin of safety?

   The margin of safety for any of the ventilation systems associated with the proposed change is not compromised. Changes associated with the identification of proper flow units are editorial and have no impact.

There are no significant safety hazards created by the change. There is no new or different accident postulated since the change is considered editorial. The design requirements of Regulatory Guide 1.52 remain satisfied. Therefore, there is no significant decrease in the margin of safety.

Pursuant to 10 CFR 50.91, the preceding analyses provides a determination that the proposed Technical Specifications change poses no significant hazard as delineated by 10 CFR 50.92.

**ENVIRONMENTAL IMPACT DETERMINATION
FOR REVISING SPECIFICATION
4.6.3, 4.7.6 and 4.9.11
OF THE VIRGIL C. SUMMER NUCLEAR STATION
TECHNICAL SPECIFICATIONS**

Environmental Assessment

This proposed Technical Specification change has been evaluated against criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). The following is a discussion of how the proposed Technical Specification change meets the criteria for categorical exclusion.

10 CRF 51.22(c)(9): The proposed change involves change to air mass flow units for in-place testing of air handling systems,

(I) the proposed change involves No Significance Hazards Consideration (refer to No Significance Hazards Evaluation);

(ii) there are no significant changes in the types or significant increase in the amounts of any effluents that may be released offsite since the proposed change does not affect the generation of any radioactive effluents nor does it affect any of the permitted release paths; and

(iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Based on the aforementioned information and pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the proposed change.