



October 1, 2001  
RC-01-0178

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

Attention: Mr. R. R. Assa

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
TECHNICAL SPECIFICATION AMENDMENT REQUEST TSP 01-0032  
ELIMINATION OF REQUIREMENTS FOR THE POST ACCIDENT SAMPLING  
SYSTEM USING THE CONSOLIDATED LINE ITEM IMPROVEMENT  
PROCESS (CLIP)

South Carolina Electric & 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). This request is being submitted pursuant to 10 CFR 50.90.

This proposed change would delete Technical Specification (TS) 6.8.4.d, "Post Accident Sampling" and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS) at VCSNS. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System." The availability of this TS improvement was announced in the Federal Register on October 31, 2000, as part of the consolidated line item improvement process (CLIP).

The VCSNS Plant Safety Review Committee and the Nuclear Safety Review Committee have reviewed this amendment application.

The TS amendment request is contained in the following attachments:

- |                |   |
|----------------|---|
| Attachment I   | Explanation of Changes Summary and Affected Pages   |
| Attachment II  | Safety Evaluation / Requested Confirmation of Applicability and Plant Specific Variations |
| Attachment III | No Significant Hazards Evaluation   |
| Attachment IV  | Commitments to Ensure Equipment Operability   |

Pool

SCE&G desires that this amendment request be approved by January 31, 2002, with the amendment being fully implemented within six months after approval. The approval date was administratively selected to allow for NRC review, but the plant does not require this amendment to allow for continued safe full power operation.

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

Various FSAR Sections (3.2, 6.2, 9.3, 11.2, and 12A.4) were reviewed. Changes to these Sections will be implemented, as appropriate, upon approval of this request. The FPER was reviewed but was not affected.

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

Should you have questions, please call Mr. Philip A. Rose at (803) 345-4052.

I certify under penalty of perjury that the foregoing is true and correct.

Very truly yours,



Stephen A. Byrne

PAR/SAB/dr  
Attachments (4)

c: N. O. Lorick  
N. S. Carns  
T. G. Eppink (w/o Attachment)  
R. J. White  
L. A. Reyes  
NRC Resident Inspector  
W. R. Higgins  
P. Ledbetter  
K. M. Sutton  
T. P. O'Kelly  
RTS (TSP 01-0032)  
File (813.20)  
DMS (RC-01-0178)

STATE OF SOUTH CAROLINA :  
COUNTY OF FAIRFIELD :

TO WIT :

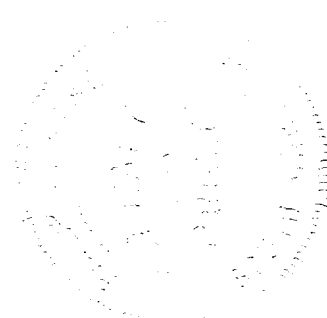
I hereby certify that on the 1<sup>st</sup> day of October 2001, before me, the subscriber, a Notary Public of the State of South Carolina personally appeared Stephen A. Byrne, being duly sworn, and states that he is Senior Vice President, Nuclear Operations of the South Carolina Electric & Gas Company, 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

Alp A. N.  
Notary Public

My Commission Expires

July 13, 2005  
Date



**Attachment To License Amendment No. XXX**  
**To Facility Operating License No. NPF-12**  
**Docket No. 50-395**

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Remove Page  
6-12

Insert Page  
6-12

**SCE&G -- EXPLANATION OF CHANGES SUMMARY**

<u>Page</u>	<u>Affected Section</u>	<u>Bar #</u>	<u>Description of Change</u>	<u>Reason for Change</u>
6-12	6.8.4.d	1	Deleting all discussion and reference to PASS.	NRC CLIIP process permits elimination of PASS

## ADMINISTRATIVE CONTROLS

### c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,
- 2) Identification of the procedures used to measure the values of the critical variables,
- 3) Identification of process sampling points, including monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,
- 4) Procedures for the recording and management of data,
- 5) Procedures defining corrective actions for all off-control point chemistry conditions,
- 6) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

### d. Postaccident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- 1) Training personnel,
- 2) Procedures for sampling and analysis,
- 3) Provisions for maintenance of sampling and analysis equipment.

### e. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determinations in accordance with the methodology in the ODCM;
- 2) Limitations on the concentration of radioactive material released in liquid effluents to unrestricted areas conforming to 10 times the concentration values in 10 CFR Part 20, Appendix B, Table 2, Column 2;

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- 4) Procedures for the recording and management of data,
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d. Not Used

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SAFETY EVALUATION  
FOR ELIMINATION OF PASS FROM  
THE VIRGIL C. SUMMER NUCLEAR STATION  
TECHNICAL SPECIFICATIONS

Description of Amendment Request

The proposed license amendment request (LAR) will revise Administrative Section 6.8, "Procedures and Programs", by deleting 6.8.4.d, "Postaccident Sampling". All associated program requirements will also be deleted.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this technical specification improvement was announced in the Federal Register, Vol. 65, No. 211, on October 31, 2000, as part of the consolidated line item improvement process (CLIIP).

Background

Westinghouse Owners Group (WOG) topical report WCAP 14986-A, Revision 2, "Post Accident Sampling System (PASS) Requirements: A Technical Basis," evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Revision 2, concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

Applicability of Published Safety Evaluation

SCE&G has evaluated the safety evaluation published on October 31, 2000, as part of the CLIIP. This included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366, (i.e., WCAP 14986-A, Revision 2). SCE&G has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the V. C. Summer Nuclear Station (VCSNS) and justify this amendment request for the incorporation of the changes to the VCSNS TS.

SCE&G is not proposing any variations or deviations from the technical Specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

NO SIGNIFICANT HAZARDS EVALUATION  
FOR ELIMINATION OF PASS FROM  
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Basis for No Significant Hazards Consideration Determination

South Carolina Electric & Gas Company (SCE&G) has reviewed the proposed no significant hazards consideration determination published on October 31, 2000, as part of the CLIIP. SCE&G has concluded that the proposed determination presented in the notice is applicable to the V. C. Summer Nuclear Station and the determination is hereby incorporated, by reference to satisfy the requirements of 10 CFR 50.91(a).

Environmental Assessment

SCE&G has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIIP. SCE&G has concluded that the staff's findings presented in that evaluation are applicable to VCSNS and the evaluation is hereby incorporated by reference for this application.



COMMITMENTS AND VERIFICATIONS  
RELATED TO ELIMINATION OF PASS FROM  
THE VIRGIL C. SUMMER NUCLEAR STATION  
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Commitments and Verifications

As discussed in the notice of availability for this technical specification improvement, we offer the following plant specific verifications and commitments.

SCE&G will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and established within 180 days of implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.

The capability for classifying fuel damage events at the Alert level threshold has been established for the VCSNS at radioactivity levels of 300micro-curies per cubic centimeter ( $\mu\text{Ci/cc}$ ) dose equivalent iodine. This capability and technique has been described in plant procedure (Chemistry Procedure CP-308). The capability for classifying fuel damage events is considered a regulatory commitment.

SCE&G will establish the capability to monitor radioactive iodines that may be released to offsite environ. This capability will be described in plant procedures (emergency plan implementing procedures) and will be established within 180 days of implementation of the license amendment. The capability to monitor radioactive iodines is considered a regulatory commitment.