



RC-03-0084
April 7, 2003

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

ATTN: Ms. K. R. Cotton

Ladies and Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST - LAR 02-2777
MODIFICATION TO REQUIREMENTS FOR MISSED SURVEILLANCES
TECHNICAL SPECIFICATION 4.0.3 , RESPONSE TO REQUEST FOR
ADDITIONAL INFORMATION

Reference: S. A. Byrne to Document Control Desk, RC-02-0148, dated September 24, 2002

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby submits a response to your verbal question, discussed over the telephone on March 13, 2003, related to the above referenced amendment request. The amendment request is for the V. C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) to adopt a generic change noticed in the Federal Register as a consolidated line item improvement program (CLIIP) change. This change is associated with the Technical Specification Task Force traveler TSTF-358, related to an extension of the allowed outage time (AOT) for missed surveillances, TS 4.0.3 (Surveillance Requirement (SR) 3.0.3).

In addition to the differences in format between our current TS and the improved Technical Specifications (ITS - NUREG 1431, Revision 2), the wording for SR 3.0.1 is different from our current TS 4.0.1, even though the intent of both is the same. Our current TS requirement for 4.0.1 states that surveillance requirements shall be applicable during the operational modes specified for the individual Limiting Conditions for Operation (LCO) unless otherwise stated in an individual surveillance requirement. The ITS requirement SR 3.0.1 states this but also includes additional guidance that establishes the philosophy for failed or missed surveillances. A failure to meet a surveillance shall be a failure to meet the LCO. Additionally, a failure to perform the surveillance within the specified frequency shall be a failure to meet the LCO except as provided in SR 3.0.3.

The bases for SR 3.0.1 provides a discussion on the intent of this additional wording as well as provides specific examples. Since our amendment request does not contain these additional words for TS 4.0.1, SCE&G will adopt the bases for SR 3.0.1 and incorporate them into our TS at the earliest convenient date once our Bases Control Program is established.

SCE&G would like to state that we have always operated VCSNS with the philosophy that not performing the required surveillance within the surveillance frequency (including any grace

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SCE&G would like to state that we have always operated VCSNS with the philosophy that not performing the required surveillance within the surveillance frequency (including any grace period) is a failure to satisfy the Limiting Condition for Operability requirements. This is no different than performing the required surveillance and failing. At this point we would declare the system, structure or component inoperable. Since this is a large part of the intent of SR 3.0.1, we have been in compliance with the intent of SR 3.0.1, even though the wording in our TS is not the same.

If you have any questions or require additional information, please contact Mr. Philip Rose at (803) 345-4052.

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

4/7/03 Executed on Stephen A. Byrne
Stephen A. Byrne

PR/SAB/dr

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