UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 26, 2016

Mr. George A. Lippard, III
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
P.O. Box 88, Mail Code 800
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 – ISSUANCE OF AMENDMENT TO REVISE TECHNICAL SPECIFICATION 3/4.7.1.2, "EMERGENCY FEEDWATER SYSTEM" (CAC NO. MF7567)

Dear Mr. Lippard:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 206 to Renewed Facility Operating License No. NPF-12 for the Virgil C. Summer Nuclear Station, Unit No. 1, in response to your application dated April 7, 2016.

This amendment approves a change to the Virgil C. Summer Nuclear Station, Unit No. 1, Technical Specification (TS) emergency feedwater (EFW) system pump performance testing requirements in TS 3/4.7.1.2, "Emergency Feedwater System." In addition, the request also included an administrative change to remove an expired note in TS 3/4.7.1.2 that temporarily extended the allowed outage time during testing and maintenance affecting the motor-driven EFW pump flow control valves.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Shawn Williams

Shawn A. Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosures:
1. Amendment No. 206 to NPF-12
2. Safety Evaluation

cc w/Enclosures: Distribution via Listserv

UNITED STATES
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SOUTH CAROLINA ELECTRIC & GAS COMPANY

SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

DOCKET NO. 50-395

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 206
Renewed License No. NPF-12

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment to the Virgil C. Summer Nuclear Station, Unit No. 1 (the facility), Renewed Facility Operating License No. NPF-12 filed by the South Carolina Electric & Gas Company (the licensee), dated April 7, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations as set forth in 10 CFR Chapter I;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-12 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 206, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. South Carolina Electric & Gas Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Michael T. Markley, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License and
Technical Specifications

Date of Issuance: October 26, 2016

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

ATTACHMENT TO LICENSE AMENDMENT NO. 206

RENEWED FACILITY OPERATING LICENSE NO. NPF-12

DOCKET NO. 50-395

Replace the following page of the Renewed Facility Operating License and Appendix "A" Technical Specifications (TSs) with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
License Page 3	License Page 3
TSs 3/4 7-4 3/4 7-5	TSs 3/4 7-4 3/4 7-5

(3) SCE&G, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage amounts required for reactor operation, as described in the Final Safety Analysis Report, as amended through Amendment No. 33;

(4) SCE&G, pursuant to the Act and 10 CFR Part 30, 40 and 70 to receive, possess and use at any time byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed neutron sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(5) SCE&G, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required any byproduct source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus of components; and

(6) SCE&G, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as m[a]y be produced by the operation of the facility.

C. This renewed license shall be deemed to contain, and is subject to, the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

SCE&G is authorized to perathe the facility at reactor core power levels not in excess of 2900 megawatts thermal in accordance with the conditions specified herein and in Attachment 1 to this renewed license. The preoccupation tests, startup tests and other items identified in Attachment 1 to this renewed license shall be completed as specified. Attachment 1 is hereby incorporated into this renewed license.

(2) Technical Specifications and Environmental Protection Plant

The Technical Specifications contained in Appendix A, as revised through Amendment No. 206, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. South Carolina Electric & Gas Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

PLANT SYSTEMS

EMERGENCY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator emergency feedwater pumps and flow paths shall be OPERABLE with:

a. Two motor-driven emergency feedwater pumps, each capable of being powered from separate emergency busses, and

b. One steam turbine driven emergency feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. With one emergency feedwater pump inoperable, restore the required emergency feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

b. With two emergency feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

c. With three emergency feedwater pumps inoperable, immediately initiate corrective action to restore at least one emergency feedwater pump to OPERABLE status as soon as possible.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each emergency feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

1. Not used.

2. Not used.

3. Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

4. Verifying that each automatic valve in the flow path from the condensate storage tank to the steam generators is in the fully open position whenever the emergency feedwater system is placed in automatic control or when above 10% RATED THERMAL POWER.

5. Verifying that valves 1010-EF and 1007-EF are locked in the open position.

b. At least once per 3 months by verifying that the check valve in the instrument air supply line to the six emergency feedwater control valve air accumulators closes when the normal instrument air supply is not available.

c. At least once per 18 months during shutdown by verifying that:

1. Each emergency feed pump starts as designed automatically upon receipt of an emergency feedwater actuation test signal.

2. The six emergency feedwater control valves can be closed and held closed for three hours with air from the accumulators when the normal instrument air supply is not available.

3. The turbine driven emergency feedwater pump can be manually stopped from the main control board by closing the steam supply valve with air from the accumulator when the normal instrument air supply is not available.

4. Each automatic valve in the flow path actuates to its correct position on receipt of an emergency feedwater actuation test signal.

d. In accordance with the Inservice Testing Program as required by Specification 4.0.5 by verifying:

1. The developed head of each emergency feedwater pump at the flow test point is greater than or equal to the required developed head. Notes: 1) Not required to be performed for the turbine driven emergency feedwater pump until secondary steam supply pressure is greater than 865 psig. 2) The provisions of Specification 4.0.4 are not applicable for the turbine driven emergency feedwater pump.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 206 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-12

SOUTH CAROLINA ELECTRIC & GAS COMPANY

SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-395

1.0 INTRODUCTION

By letter dated April 7, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16104A027), South Carolina Electric & Gas Company (the licensee), submitted a license amendment request (LAR) to modify the Virgil C. Summer Nuclear Station (VCSNS), Unit No. 1, Technical Specifications (TSs). The proposed change to the VCSNS TSs would revise the emergency feedwater (EFW) system pump performance testing requirements in TS 3/4.7.1.2, "Emergency Feedwater System." The specific EFW pump developed head and flow performance values required by TS Surveillance Requirements (SRs) 4.7.1.2.a.1 and 4.7.1.2.a.2 would be replaced by a new SR requiring verification that the developed head of each EFW pump at the flow test point is greater than or equal to the required developed head in accordance with the inservice testing (IST) program specified by TS 4.0.5. In addition, the request also included an administrative change to remove an expired note in TS 3/4.7.1.2 that temporarily extended the allowed outage time during testing and maintenance affecting the motor-driven EFW pump flow control valves.

2.0 REGULATORY EVALUATION

2.1 System Description

Section 10.4.9 of the VCSNS Final Safety Analysis Report (FSAR) provides a description of the EFW system. The EFW system includes two motor-driven pumps, one turbine-driven pump, a condensate storage tank, piping, valves, instrumentation, and controls. The EFW pumps normally take suction from the condensate storage tank, and the safety-related service water system provides a reliable backup supply to the EFW pump suction lines. Each EFW pump is provided with a fixed-restriction minimum flow capability that continuously recirculates flow to the condensate storage tank. The discharge flow from the motor-driven EFW pumps is combined into a single header and divided into three lines, with one line for each steam generator (SG). Each line contains an isolation valve and a pneumatically-operated flow

control valve. The discharge of the turbine-driven EFW pump is similarly divided into three lines, with one line for each SG. These lines include a separate isolation valve and a separate pneumatically-operated flow control valve for each SG. The flow from the motor-driven pumps is combined with the flow from the turbine-driven pump downstream of the flow control valves. The combined flow passes through a containment isolation valve on its way to the respective SG.

The EFW system is designed to deliver sufficient feedwater to the SGs for cooldown upon loss of the normal feedwater supply and to contribute to mitigation of certain events. The system design ensures that no single failure would prevent delivery of at least 380 gallons per minute (gpm) to two or more SGs at a pressure of 1,211 pounds per square inch gauge (psig). In addition to the loss of feedwater and loss of offsite power event, which results in a loss of feedwater, Sections 15.3 and 15.4 of the VCSNS FSAR credit the EFW system for heat removal during certain infrequent or limiting faults, including small-break loss-of-coolant accidents, secondary system pipe rupture accidents, and SG tube rupture events. The EFW system operates in conjunction with the turbine bypass system, if available, or the main steam power relief valves and safety valves, to remove thermal energy from the SGs. To minimize peak containment pressure for some secondary system pipe ruptures, the accident analyses assume EFW flow to the SG faulted by the rupture will be isolated by manual operation within specific time periods if the flow control valve fails to automatically close. The system is also used to supply feedwater to the SGs during startup, shutdown, and layup operations.

2.2 Amendment Request Scope

The licensee requested changes to TS 3/4.7.1.2, "Emergency Feedwater System." The proposed change would delete TS SRs 4.7.1.2.a.1 and 4.7.1.2.a.2, which prescribe tests at a frequency of once per 31 days for the motor-driven EFW pumps and turbine-driven EFW pump, respectively. For the motor-driven EFW pumps, existing TS SR 4.7.1.2.a.1 requires verification that each pump develops a total head of greater than or equal to 3,800 feet at a flow of greater than or equal to 90 gpm. For the turbine-driven EFW pump, TS SR 4.7.1.2.a.2 requires verification that the pump develops a total head of greater than or equal to 3,140 feet at a flow of greater than or equal to 97 gpm when the secondary steam supply pressure is greater than 865 psig. The TS SR for the turbine-driven EFW pump notes that the provisions of TS 4.0.4 are not applicable. The provisions of TS 4.0.4 prohibit entry into an operational mode before all SRs associated with limiting conditions for operation (LCOs) applicable to that operational mode have been completed,

In place of these SRs, the licensee proposed adding TS SR 4.7.1.2.d, which would require verifying the developed head of each EFW pump at the flow test point is greater than or equal to the required developed head. The required developed head would be established in accordance with the IST program required by TS 4.0.5. The proposed TS SR 4.7.1.2.d includes the following notes:

1) Not required to be performed for the turbine driven emergency feedwater pump until secondary steam supply pressure is greater than 865 psig.
2) The provisions of Specification 4.0.4 are not applicable for the turbine driven emergency feedwater pump.

These notes are consistent with the conditions specified in the existing TS SR 4.7.1.2.a.2.

The licensee stated that the purpose of the above requested change is to allow implementation of a planned EFW system modification. The planned modification includes the addition of cavitating venturis and automatic recirculation valves to the EFW pump discharge flow paths to improve flow margins. Cavitating venturis limit the maximum flow through otherwise low resistance flowpaths, such as flow to a SG faulted by a secondary system piping rupture. An automatic recirculation valve eliminates flow lost through minimum recirculation lines when adequate flow paths are available, thereby increasing flow in the primary discharge flowpaths. The licensee stated that these modifications would be implemented under the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.59, "Changes, tests and experiments," which allows licensees to make changes to the licensed facility without prior U.S. Nuclear Regulatory Commission (NRC or the Commission) staff approval when conditions specified in the regulation are satisfied. Therefore, these modifications are outside the scope of the LAR.

In addition to the above changes, the licensee proposed deletion of an expired footnote that temporarily extended the allowed outage time for two inoperable EFW pumps under TS 3.7.1.2, Action b., from 6 hours to 24 hours to permit testing and remedial maintenance affecting the motor-driven EFW pump flow control valves. This footnote expired on March 18, 2016.

The format and content of the VCSNS TSs were based on the Standardized Technical Specifications published in NUREG-0452, Revision 4, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," 1981, which has been superseded by more recent guidance.

2.3 Regulatory Criteria

The proposed license amendment involves a change to the content of the TSs. The staff reviews the proposed TS changes for compliance with applicable regulations and conformance with associated regulatory guidance.

Section 50.36 of 10 CFR requires that each operating license issued by the Commission contain TSs that include LCOs, which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met. This regulation also requires SRs, which are test, calibration, or inspection activities that assure the necessary quality of systems is maintained, and the LCO for operation will be met.

Guidance for staff review of TSs is contained in Section 16.0, "Technical Specifications," of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition." The NRC staff has prepared STS for each of the light-water reactor nuclear steam supply systems and associated balance-of-plant equipment systems. The guidance specifies that the staff ensures the content and format are consistent with the applicable STS. Where TS provisions depart from the reference TSs, the staff determines

whether proposed differences are justified by uniqueness in plant design or other considerations.

The applicable STS for VCSNS are contained in NUREG-1431, Revision 4, "Standard Technical Specifications - Westinghouse Plants." The SRs specified in NUREG-1431, TS 3.7.5, "Auxiliary Feedwater System," include the following statement in SR 3.7.5.2:

> Verify the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head.

The specified frequency of this surveillance was in accordance with the IST program. The IST program contained in TS 5.5.8 of NUREG-1431 specified testing frequencies consistent with the American Society of Mechanical Engineers (ASME) Code for Operations and Maintenance of Nuclear Power Plants (OM Code). The note modifying SR 3.7.5.2 stated:

> [Not required to be performed for the turbine driven AFW pump until [24 hours] after ≥ [1000] psig in the SG.]

The bases for this SR state that the note indicates the test should be deferred until suitable test conditions have been established, and the deferral is necessary because the steam pressure must be sufficient to perform the test.

3.0 TECHNICAL EVALUATION

3.1 Change in EFW Pump SRs

Licensee Proposed Changes

The proposed change to VCSNS SR 4.7.1.2 replaces the existing EFW pump test requirements for a minimum required developed head at a specific minimum flow rate with a requirement to verify the pump develops a head greater than the required developed head at a flexible flow test point. The determination of the required developed head at the flow test point would be established using the ASME OM Code. The frequency of the replacement test is also established consistent with the IST program required by TS 4.0.5 and the ASME OM Code.

NRC Staff Evaluation

The staff reviewed the proposed replacement tests and required frequencies and found them acceptable because they will allow the SR to continue to meet the regulatory requirements of 10 CFR 50.36, and they are consistent with the SRs specified in NUREG-1431. The notes modifying the proposed testing of the turbine-driven EFW pump in SR 4.7.1.2.d differ from the notes applicable to testing of turbine-driven AFW pumps specified in TS 3.7.5 of NUREG-1431. For the proposed note in SR 4.7.1.2.d and the note in NUREG-1431, SR 3.7.5.2, different values are specified for the minimum SG test pressure. However, the minimum pressure is necessary to establish appropriate conditions for testing of the pump, and the test pressure in proposed SR 4.7.1.2.d is identical to the test pressure specified in existing SR 4.7.1.2.a.2. The proposed test pressure is consistent with the existing licensing basis for VCSNS. Therefore, the

NRC staff found that SR 4.7.1.2 will continue to meet the regulatory requirements of 10 CFR 50.36 because it will continue to provide assurance that the necessary quality of systems is maintained, and the LCO will be met. The note in NUREG-1431, SR 3.7.5.2 also specifies that the test is not required to be performed for a specified time after the SG pressure has reached the minimum value, and this deferral period is necessary because the steam pressure must be adequate to perform the test. The note in proposed SR 4.7.1.2.d provides this deferral in testing by stating that the provisions of TS 4.0.4, which preclude changes in operational modes until applicable TS LCOs have been demonstrated as satisfied by associated SRs, are not applicable to this test. This provision allows VCSNS to be heated to operating Mode 3, hot standby, where the necessary SG pressure for the test can be achieved. This provision is consistent with the note in the existing SR 4.7.1.2.a.2. The staff found the note included in proposed SR 4.7.1.2.d acceptable because it retains the same information as the existing SR 4.7.1.2.a.2, and the note satisfies the same purpose as the note in NUREG-1431, SR 3.7.5.2.

3.2 Deletion of Expired Allowed Outage Time Extension

The licensee proposed removal of a footnote that temporarily extended the allowed outage time for two inoperable EFW pumps under TS 3.7.1.2, Action b., from 6 hours to 24 hours to permit testing and remedial maintenance affecting the motor-driven EFW pump flow control valves. This footnote expired on March 18, 2016. Since the footnote is expired and no longer applicable, the change is administrative in nature and acceptable.

3.3 NRC Staff Conclusion

The proposed changes to SR 4.7.1.2 replace specific flow test requirements with test requirements established through the existing IST program required by existing VCSNS, Unit No. 1, TS 4.0.5. The staff found this change acceptable because it will allow the SR to continue to meet the regulatory requirements of 10 CFR 50.36, and the change in test requirements is consistent with those specified in the STS included in NUREG-1431. Although the proposed note establishing the inservice test conditions for the turbine-driven EFW pump differed from those specified in NUREG-1431, the test conditions remained consistent with established test conditions in existing SR 4.7.1.2.a.2 for the turbine-driven EFW pump. Since the proposed test conditions are unchanged from those associated with the existing test, the proposed note is also acceptable. The remaining change to a footnote associated with TS 3.7.1.2 was an acceptable administrative change.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the South Carolina State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no

significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration published in the *Federal Register* on June 7, 2016 (81 FR 36622), and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Steve Jones, NRR

Date: October 26, 2016

October 26, 2016

Mr. George A. Lippard, III
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
P.O. Box 88, Mail Code 800
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 – ISSUANCE OF AMENDMENT TO REVISE TECHNICAL SPECIFICATION 3/4.7.1.2, "EMERGENCY FEEDWATER SYSTEM" (CAC NO. MF7567)

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Sincerely,
/RA/
Shawn A. Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

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cc w/Enclosures: Distribution via Listserv

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