

## ATTACHMENT 1

Attachment 1 contains marked-up Technical Specification pages. The proposed change deletes surveillance requirement 4.8.4.2.a.1 because it is not applicable to the Virgil C. Summer Nuclear Station since there are no thermal overload devices which are continuously bypassed. This change also combines the surveillance requirements of sections 4.8.4.2.b.1 and 4.8.4.2.b.2 since section 4.8.4.2.b.2 alone is not applicable as stated. This combination of surveillance requirements will require stroke testing of the 38 motor operated valves with overloads which are not bypassed as identified in Table 3.8-2.

ELECTRICAL POWER SYSTEMS

MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND BYPASS DEVICES

LIMITING CONDITION FOR OPERATION

3.8.4.2 The thermal overload protection and bypass devices, integral with the motor starter, of each valve listed in Table 3.8-2 shall be OPERABLE.

APPLICABILITY: Whenever the motor operated valve is required to be OPERABLE.

ACTION:

With one or more of the thermal overload protection and/or bypass devices inoperable, declare the affected valve(s) inoperable and apply the appropriate ACTION Statement(s) for the affected valve(s).

SURVEILLANCE REQUIREMENTS

4.8.4.2 The above required thermal overload protection and bypass devices shall be demonstrated OPERABLE:

- a. At least once per 18 months, by the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST of the bypass circuitry for those thermal overload devices which are either:
1. Continuously bypassed and temporarily placed in force only when the valve motors are undergoing periodic or maintenance testing, or
  2. Normally in force during plant operation and bypassed under accident conditions.
- b. At least once per 18 months by the performance of a CHANNEL CALIBRATION of a representative sample of at least 25% of:
1. All thermal overload devices which are not bypassed, such that each non-bypassed device is calibrated at least once per 6 years.
  2. All thermal overload devices which are continuously bypassed and temporarily placed in force only when the valve motors are undergoing periodic or maintenance testing, and thermal overload devices normally in force and bypassed under accident conditions such that each thermal overload is calibrated and each valve is cycled through at least one complete cycle of full travel with the motor operator when the thermal overload is OPERABLE and not bypassed, at least once per 6 years.

INSERT A

\*INSERT A

#### SURVEILLANCE REQUIREMENTS

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4.8.4.2 The above required thermal overload protection and bypass devices shall be demonstrated OPERABLE:

- a. At least once per 18 months by the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST of the bypass circuitry for those thermal overload devices which are normally in force during plant operation and bypass under accident conditions.
- b. At least once per 18 months by the performance of a CHANNEL CALIBRATION of a representative sample of at least 25% of the MOV's with required safety functions such that each thermal overload is calibrated and each valve is cycled through at least one complete cycle of full travel with the motor operator when the thermal overload is OPERABLE and not bypassed, at least once per 6 years.



## ATTACHMENT 2

Attachment 2 contains marked-up Technical Specification pages for Table 3.8-2. Two valves were deleted from Table 3.8-2 and twelve were added (as noted). The table was also rearranged in alphanumeric order, and ten valve designations were updated as listed below. The valve functions of the MOV's listed were also updated to agree with the site computer system listing.

<u>Old Valve Number</u>	<u>New Valve Number</u>	<u>Reason for Change</u>
XVG0115B-CS	LCV0115B-CS	Valve is a level control valve.
XVG0115C-CS	LCV0115C-CS	Valve is a level control valve.
XVG0115D-CS	LCV0115D-CS	Valve is a level control valve.
XVG0115E-CS	LCV0115E-CS	Valve is a level control valve.
XVT0602A-RH	FCV0602A-RH	Valve is a flow control valve.
XVT0602B-RH	FCV0602B-RH	Valve is a flow control valve.
FCV8701A-RH	XVG8701A-RH	Valve is a gate valve.
FCV8701B-RH	XVG8701B-RH	Valve is a gate valve.
FCV8702A-RH	XVG8702A-RH	Valve is a gate valve.
FCV8702B-RH	XVG8702B-RH	Valve is a gate valve.

Table 3.8-2

Motor Operated Valves Thermal Overloads Protection and/or Bypass Devices

<u>Valve #</u>	<u>Function</u>	<u>Bypass Devices</u> <u>Y/N</u>
FCV0602A-RH	RHR Pump A Miniflow Valve	No
FCV0602B-RH	RHR Pump B Miniflow Valve	No
LCV0115B-CS	CHG Pump A Suction HDR RWST ISOL VLV	Yes
LCV0115C-CS	Volume Control Tank Outlet ISOL Valve	Yes
LCV0115D-CS	CHG Pump B Suction HDR RWST ISOL VLV	Yes
LCV0115E-CS	Volume Control Tank Outlet ISOL Valve	Yes
XVB3106A-SW	SW Booster Pump A Discharge Valve	Yes
XVB3106B-SW	SW Booster Pump B Discharge Valve	Yes
XVB3110A-SW	RBCU 1A & 2A IC SYS Supply ISOL Valve	Yes
XVB3110B-SW	RBCU 1B & 2B IC SYS Supply ISOL Valve	Yes
XVB3126A-SW	HVAC Chiller Condenser A SW Supply VLV	No
XVB3126B-SW	HVAC Chiller Condenser B SW Supply VLV	No
XVB3128A-SW	HVAC Chiller Cond C SW HDR A IN ISOL VLV	No
XVB3128C-SW	HVAC Chiller Cond C SW HDR B IN ISOL VLV	No
XVB9503A-CC	RHR HX A CC Inlet Valve	No
XVB9503B-CC	RHR HX B CC Inlet Valve	No
XVG1001A-EF	MTR DR EF Pump A SW A SUCT XCONN VLV	Yes
XVG1001B-EF	MTR DR EF Pump B SW A SUCT XCONN VLV	Yes
XVG1002-EF	TURB DR EF Pump SW B SUCT XCONN VLV	Yes
XVG1008-EF	TURB DR EF Pump SW A SUCT XCONN VLV	Yes
XVG1037A-EF	EF Service Water HDR A XCONN ISOL VLV	Yes
XVG1037B-EF	EF Service Water HDR B XCONN ISOL VLV	Yes
XVG2802A-MS	MS Header B EF Pump Turbine Supply VLV	Yes
XVG2802B-MS	MS Header C EF Pump Turbine Supply VLV	Yes
XVG3001A-SP	RB Spray PP A RWST Suction HDR VLV	Yes
XVG3001B-SP	RB Spray PP B RWST Suction HDR VLV	Yes
XVG3002A-SP	NAOH HDR A Supply ISOL Valve	Yes



Table 3.8-2 (Cont.)

Motor Operated Valves Thermal Overloads Protection and/or Bypass Devices

<u>Valve #</u>	<u>Function</u>	<u>Bypass Devices</u> <u>Y/N</u>
XVG3002B-SP	NAOH HDR B Supply ISOL Valve	Yes
XVG3003A-SP	RB Spray Header A Supply Valve (ORC)	Yes
XVG3003B-SP	RB Spray Header B Supply Valve (ORC)	Yes
XVG3004A-SP	RB Spray Sump ISOL Valve A (IRC)	Yes
XVG3004B-SP	RB Spray Sump ISOL Valve B (IRC)	Yes
XVG3005A-SP	RB Spray Sump ISOL Valve A (ORC)	Yes
XVG3005B-SP	RB Spray Sump ISOL Valve B (ORC)	Yes
XVG3103A-SW	RBCU 1A & 2A Return Header ISOL VLV	No
XVG3103B-SW	RBCU 1B & 2B Return Header ISOL VLV	No
XVG3107A-SW	SW Pond RBCU 1A&2A Return ISOL VLV	Yes
XVG3107B-SW	SW Pond RBCU 1B&2B Return ISOL VLV	Yes
XVG3108A-SW	RB Cooling Unit 1A Inlet ISOL VLV	Yes
XVG3108B-SW	RB Cooling Unit 2A Inlet ISOL VLV	Yes
XVG3108C-SW	RB Cooling Unit 1B Inlet ISOL VLV	Yes
XVG3108D-SW	RB Cooling Unit 2B Inlet ISOL VLV	Yes
XVG3109A-SW	RB Cooling Unit 1A Outlet ISOL VLV	Yes
XVG3109B-SW	RB Cooling Unit 2A Outlet ISOL VLV	Yes
XVG3109C-SW	RB Cooling Unit 1B Outlet ISOL VLV	Yes
XVG3109D-SW	RB Cooling Unit 2B Outlet ISOL VLV	Yes
XVG3111A-SW	RBCU 1A&2A IC SYS Return ISOL VLV	Yes
XVG3111B-SW	RBCU 1B&2B IC SYS Return ISOL VLV	Yes
XVG3112A-SW	RBCU 1A&2A IC SYS Return VLV	Yes
XVG3112B-SW	RBCU 1B&2B IC SYS Return VLV	Yes
XVG6516-VU	CC Pump A Motor Cooler VU Outlet ISOL VLV	No
XVG6517-VU	CC Pump C Motor Cooler VU ALT Out ISOL VLV	No
XVG6518-VU	CC Pump C Motor Cooler VU ALT Out ISOL VLV	No
XVG6519-VU	CC Pump B Motor Cooler VU Outlet ISOL VLV	No
XVG6797-FS	Fire Service Containment Isol. Valve	Yes

Table 3.8-2 (Cont.)

Motor Operated Valves Thermal Overloads Protection and/or Bypass Devices

<u>Valve #</u>	<u>Function</u>	<u>Bypass Devices</u> <u>Y/N</u>
XVG7501-AC	AC Supply Header Containment Isol. Valve	Yes
XVG7502-AC	AC Supply Header Containment Isol. Valve	Yes
XVG7503-AC	AC Return Header Containment Isol. Valve	Yes
XVG7504-AC	AC Return Header Containment Isol. Valve	Yes
XVG8106-CS	Charging Pump Miniflow Header ISOL Valve	No
XVG8107-CS	Charging Pump Discharge Header ISOL Valve	Yes
XVG8108-CS	Charging Pump Discharge Header ISOL Valve	Yes
XVG8130A-CS	Charging Pump A to C SUCT XCONN VLV	No
XVG8130B-CS	Charging Pump A to C SUCT XCONN VLV	No
XVG8131A-CS	Charging Pump B to C SUCT XCONN VLV	No
XVG8131B-CS	Charging Pump B to C SUCT XCONN VLV	No
XVG8132A-CS	Charging Pump A to C DISCH XCONN VLV	No
XVG8132B-CS	Charging Pump A to C DISCH XCONN VLV	No
XVG8133A-CS	Charging Pump B to C DISCH XCONN VLV	No
XVG8133B-CS	Charging Pump B to C DISCH XCONN VLV	No
XVG8701A-RH	RB Header A ISOL Valve (IRC)	Yes
XVG8701B-RH	RB Header B ISOL Valve (IRC)	Yes
XVG8702A-RH	RH Inlet Header A ISOL Valve	Yes
XVG8702B-RH	RH Inlet Header B ISOL Valve	Yes
XVG8706A-RH	CHG/SI Pump SUCT HDR RH HDR A Inlet VLV	No
XVG8706B-RH	CHG/SI Pump SUCT HDR RH HDR B Inlet VLV	No
XVG8801A-SI	HI Head Injection Valve	Yes
XVG8801B-SI	HI Head Injection Valve	Yes
XVG8808A-SI	SI Accumulator A Discharge Header Valve	Yes
XVG8808B-SI	SI Accumulator B Discharge Header Valve	Yes
XVG8808C-SI	SI Accumulator C Discharge Header Valve	Yes
XVG8809A-SI	Refuel WTR STG TK RH Pump A SUCT VLV	No
XVG8809B-SI	Refuel WTR STG TK RH Pump A SUCT VLV	No



Table 3.8-2 (Cont.)

Motor Operated Valves Thermal Overloads Protection and/or Bypass Devices

<u>Valve #</u>	<u>Function</u>	<u>Bypass Devices</u> <u>Y/N</u>
XVG8811A-SI	CNTMT Sump RH Pump A SUCT ISOL VLV	Yes
XVG8811B-SI	CNTMT Sump RH Pump B SUCT ISOL VLV	Yes
XVG8812A-SI	RH Pump A Suction HDR VLV	Yes
XVG8812B-SI	RH Pump B Suction HDR VLV	Yes
XVG8884-SI	High Head to Hot Leg Inj. Header ISOL VLV	No
XVG8885-SI	High Head to Cold Leg Inj. Header ISOL VLV	No
XVG8886-SI	High Head to Hot Leg Inj. Header ISOL VLV	No
XVG8887A-SI	Low Head Inj. HDR A XCONN Valve	No
XVG8887B-SI	Low Head Inj. HDR B XCONN Valve	No
XVG8888A-SI	Cold Leg Injection Header ISOL Valve	No
XVG8888B-SI	Cold Leg Injection Header ISOL Valve	No
XVG8889-SI	Hot Leg Injection Header ISOL Valve	No
XVG9568-CC	Excess LTDN HX Inlet CC HDR ISOL Valve	Yes
XVG9600-CC	RB CC Supply Header ISOL Valve	Yes
XVG9605-CC	RB CC Return Header ISOL Valve	Yes
XVG9606-CC	RB CC Return Header ISOL Valve	Yes
XVK1633A-FW	STM GEN A CHEM Feed HDR ISOL Valve	Yes
XVK1633B-FW	STM GEN B CHEM Feed HDR ISOL Valve	Yes
XVK1633C-FW	STM GEN C CHEM Feed HDR ISOL Valve	Yes
XVT2813-MS	EF Pump TURB Steam Supply HDR Drain VLV	Yes
XVT8100-CS	RC Pump Seal Return HDR ISOL Valve (ORC)	Yes
XVT8109A-CS	Charging Pump A Miniflow ISOL Valve	No
XVT8109B-CS	Charging Pump B Miniflow ISOL Valve	No
XVT8109C-CS	Charging Pump C Miniflow ISOL Valve	No
XVT8112-CS	RC Pump Seal Return HDR ISOL Valve (IRC)	Yes



ATTACHMENT 3

Attachment 3 contains a description of the amendment request and supporting safety evaluation.

SAFETY EVALUATION FOR VIRGIL C. SUMMER NUCLEAR STATION

***Description of Amendment Request:***

Technical Specification 3/4.8.4.2 addresses motor operated valves (MOV's) thermal overload and bypass devices. The intent of the surveillance tests in this technical specification is to assure the operability of the MOV's thermal overload protection and/or bypass devices. The operability of these devices ensures that they will not prevent the MOV's from performing their safety functions during accident conditions. The table listing these MOV's, Table 3.8-2, will be rearranged in alphanumeric order to improve the ease in which the table can be used and ten valve designations will be updated as listed in Attachment 2. The valve functions listed in this table will be updated to agree with the site computer system listing also. Item 4.8.4.2 of the Technical Specification is being revised to reflect the actual type of bypass circuitry used on the motor operated valves in Table 3.8-2. These valves have circuitry normally in force during plant operations and bypassed under accident conditions. Continuously bypassed circuitry, as referenced in existing Technical Specifications, does not exist at this plant.

Two valves will be deleted from Table 3.8-2. These valves (XVG-8803A-SI and XVG-8803B-SI) were removed during Refueling Outage #2 with the removal of the boron injection tank and are no longer subject to testing requirements. There will also be twelve valves added to Table 3.8-2. Four valves (XVG-7501, 2, 3, 4-AC) are needed for containment isolation and should have initially been included in Table 3.8-2. Testing of these valves was previously covered under plant procedures. They were last tested April 14, 1987 and May 8, 1987. These valves will now be added to the listing of Table 3.8-2 so as to assure their testing for correct response under manual operating conditions. An additional eight valves (XVB-3126A & B-SW, XVB-3128 A&C-SW and XVG-6516, 17, 18 and 19-VU) are also to be added to Table 3.8-2. They were previously omitted because they are non-bypassed valves. These valves are auxiliary support devices since they are required to automatically open and close depending upon whether their associated equipment is running or not. They are, therefore, subject to the requirements of Reg. Guide 1.106 which is the basis for this specification.

The final proposed change combines the surveillance requirements of sections 4.8.4.2.b.a and 4.8.4.2.b.2. This combination of surveillance requirements involves stroke testing thirty-eight motor operated valves listed in Table 3.8-2 whose overloads are not bypassed. Adding surveillance requirements to these thirty-eight motor operated valves will make the testing of bypassed and non-bypassed MOV's consistent.



### **Safety Evaluation:**

The changes made to section 4.8.4.2 of Technical Specification 3/4.8.4 are proposed to delete surveillance requirements for continuously bypassed circuitry since this design alternative is not used at Virgil C. Summer Nuclear Station. This change in no way affects the intent of the surveillance requirements in place for testing bypass circuitry and will therefore maintain the margin of plant safety as described in the bases of the technical specifications. These tests are used to resolve concerns of thermal overloads interfering with the operation of MOV's during accident conditions.

The rearranging of Table 3.8-2 into alphanumeric order is proposed to improve the ease in which the table can be used and has no impact on plant operation or safety. The updating of valve designations has no safety impact either since these valves will still be subject to testing and no physical change to the plant has been made. Making the valve function listing agree with the site computer listing is proposed to make the references consistent. This change is purely editorial and has no safety impact.

The addition of twelve valves to the surveillance requirements provides assurance that they will perform under accident conditions. Four of the twelve valves (XVG-7501, 2, 3, 4-AC) are needed for containment isolation and should have been initially included. (These valves were previously tested under plant procedures for correct electrical operation.) These four valves will be added to the listing of Table 3.8-2 so as to assure their testing for correct response under manual operating conditions. The additional eight valves (XVB-3126 A&B-SW, XVB-3128A&C-SW and XVG-6516, 17, 18, & 19-VU) are added because they are considered auxiliary support devices and are subject to the requirements of R.G. 1.106 (the basis for T.S. 3/4.8.4). These eight valves are required to automatically open and close depending on the operation of their associated equipment. Imposing additional surveillance requirements on the twelve valves mentioned above will provide greater assurance as to their proper operation under accident conditions.

The deletion of two valves (XVG-8803A & B-SI) from Table 3.8-2 is due to the removal of the boron injection tank during Refueling Outage #2. The evaluation and approval for removal of these MOV's along with the tank was controlled under the plant's modification program. And since these MOV's are no longer a part of the plant system, they no longer affect the safety functions of the plant.

Lastly, surveillance requirements 4.8.4.2.b.1 and 4.8.4.2.b.2 were combined to incorporate the testing of thirty-eight MOV's whose overloads are not bypassed (as listed on Table 3.8-2) as well as those with overloads bypassed. This combination will add assurance that these valves will operate properly under accident conditions.

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October 26, 1990  
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Pursuant to the above information, the proposed Technical Specification change does not involve a reduction in the margin of safety since the changes do not have an adverse impact on containment integrity, systems, or components important to safety or any other design feature. There is also no unreviewed safety question involved in this Technical Specification change.



#### ATTACHMENT 4

Attachment 4 contains a description of the amendment request and associated no significant hazards evaluation.

***Description of Amendment Request:***

Technical Specification 3/4.8.4.2 addresses motor operated valves (MOV's) thermal overload and bypass devices. The intent of the surveillance tests in this technical specification is to assure the operability of the MOV's thermal overload protection and/or bypass devices. The operability of these devices ensures that they will not prevent the MOV's from performing their safety functions during accident conditions. The table listing these MOV's, Table 3.8-2, will be rearranged in alphanumeric order to improve the ease in which the table can be used and ten valve designations will be updated as listed in Attachment 2. The valve functions listed in this table will be updated to agree with the site computer system listing also. Item 4.8.4.2 of the Technical Specification is being revised to reflect the actual type of bypass circuitry used on the motor operated valves in Table 3.8-2. These valves have circuitry normally in force during plant operations and bypassed under accident conditions. Continuously bypassed circuitry, as referenced in the existing Technical Specifications, does not exist at this plant.

Two valves will be deleted from Table 3.8-2. These valves (XVG-8803A-SI and XVG-8803B-SI) were removed during Refueling Outage #2 with the removal of the boron injection tank, and are no longer subject to testing requirements. There will also be twelve valves added to Table 3.8-2. Four valves (XVG-7501, 2, 3, 4-AC) are needed for containment isolation and should have initially been included in Table 3.8-2. Testing of these valves was previously covered under plant procedures. They were last tested April 14, 1987 and May 8, 1987. These valves will now be added to the listing of Table 3.8-2 so as to assure their testing for correct response under manual operating conditions. An additional eight valves (XVB-3126 A&B-SW, XVB-3128 A&C-SW and XVG-6516, 17, 18 & 19-VU) are also to be added to Table 3.8-2. They were previously omitted because they are non-bypassed valves. These valves are auxiliary support devices since they are required to automatically open and close depending upon whether their associated equipment is running or not. They are, therefore, subject to the requirements of Reg. Guide 1.106 which is the basis for this specification.

The final proposed change combines the surveillance requirements of sections 4.8.4.2.b.1 and 4.8.4.2.b.2. This combination of surveillance requirements involves stroke testing thirty-eight motor operated valves listed in Table 3.8-2 whose overloads are not bypassed. Adding surveillance requirements to these thirty-eight motor operated valves will make the testing of the bypassed and non-bypassed MOV's consistent.



***Basis for No Significant Hazards Consideration:***

Based on the following evaluation, SCE&G has determined the proposed change does not involve a significant hazards consideration.

1. The proposed change does not increase the probability or consequences of an accident previously evaluated in the FSAR.

The deletion of surveillance requirements not applicable to the Virgil C. Summer Nuclear Station in no way diminishes surveillance requirements presently in place in technical specifications for MOV's and their associated safety systems. These tests are used to assure that thermal overloads and/or bypass circuitry associated with each MOV will not prevent it from operating under accident conditions. Therefore, the probability or consequences of a previously evaluated accident has not been increased.

Additional testing is also being imposed on MOV's with non-bypassed overloads to assure their operability under accident conditions. Since this proposed change does not physically alter safety related equipment or change the safety function of any safety related equipment, the probability or consequences of a previously evaluated accident has not been increased.

Additional MOV's have been included to the list of MOV's subjected to these surveillance tests. Adding requirements will not increase the probability or consequences of an accident previously evaluated but will add to the operability checks already in place.

The deletion of two valves from Table 3.8-2 which no longer exist in the plant system will not increase the probability or consequences of an accident previously evaluated in the FSAR. These MOV's were removed in accordance with the plant modification program and are no longer subject to testing requirements.

And lastly, rearranging Table 3.8-2 into alphanumeric order, updating valve designations, and making the valve function listing consistent with the site computer listing are editorial changes in nature and have no technical impact. No physical change to the plant is being made and test requirements for the MOV's are still in place. These changes therefore will not increase the probability or consequences of an accident previously evaluated in the FSAR.

2. The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The deletion of surveillance requirements not applicable to Virgil C. Summer Nuclear Station will not create the possibility of a new or different kind of accident since surveillance requirements presently in technical specifications for MOV's and their associated safety systems are still in place.

Adding surveillance test to MOV's with thermal overloads not bypassed does not contribute to the possibility of a new or different kind of accident since the plant as described in the FSAR is not being physically altered. Additional testing will only add to the operability checks already in place in the safety analysis of the FSAR.

The addition of twelve valves being subjected to testing will not increase the possibility of a new accident from any previously evaluated. As stated before, adding operability checks does not create a safety problem but adds to the assurance that the MOV's will operate safely and correctly under accident conditions.

The deletion of two valves from Table 3.8-2 will not create a new kind of accident since these MOV's were removed and no longer impact on the plant's safety systems.

Lastly, rearranging Table 3.8-2 into alphanumeric order, updating valve designations, and making the valve function listing consistent with the site computer listing will not create the possibility of a new or different accident than previously evaluated since they have no technical impact and are purely administrative changes. No change to the plant is being made and surveillance requirements are not being decreased.

3. The proposed change does not reduce the margin of safety as defined in the bases of the technical specifications.

The deletion of non-applicable surveillance requirements does not alter the basic surveillance requirements in the technical specifications imposed on MOV's with thermal overload protection. Therefore, the margin of safety as defined in the technical specification bases has not been reduced.

Additional surveillance testing imposed on MOV's with thermal overloads not bypassed does not reduce the margin of safety as defined in technical specifications. It does, however, add assurance to the operability of these MOV's which is in the intent of the surveillance tests.

Additional MOV's have been included in the list of MOV's that are subjected to these surveillance tests. Adding requirements does not decrease the margin of safety, but instead adds to the operability checks already in place. And as before stated, assuring operability is the intent of the surveillance tests.

The deletion of two valves from Table 3.8-2 will not decrease the margin of safety because the MOV's are no longer a part of the plant system.

Lastly, rearranging Table 3.8-2 into alphanumeric order, updating valve designations, and making the valve function listing consistent with the



site computer listing have no technical impact. All test requirements as described in the technical specifications are still in place for the MOV's on Table 3.8-2. Therefore, this change will not reduce the margin of safety as described in the bases of the technical specifications.

Pursuant to 10CFR50.91, the preceding analyses provides a determination that the proposed change poses no significant hazard as defined by 10CFR50.92. In view of the preceding, South Carolina Electric & Gas Company has determined that the proposed license amendment does not involve any significant hazards considerations.