SOUTH CAROLINA ELECTRIC & GAS COMPANY
POST OFFICE 764
COLUMBIA, SOUTH CAROLINA 29218

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

June 20, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Phase III Testing

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G) is currently performing Phase III testing as described in Chapter 14 of the Virgil C. Summer Nuclear Station Final Safety Analysis Report (FSAR). It has come to our attention that a potential discrepancy exists in conducting two (2) of the Phase III tests, a 10% load swing and a 50% load rejection, and License Condition 2.C(22). License Condition 2.C(22) states: "For operations above 90% of full power, SCE&G shall control the reactor manually or the rods shall be out greater than 215 steps until written approval is received from the NRC Staff authorizing removal of this restriction."

License Condition 2.C(4) requires performance of start-up tests as discussed in Chapter 14 of the FSAR. The 10% load swing test is a required test as described in Chapter 14, Table 14.1-73 of the Virgil C. Summer Nuclear Station FSAR. The purpose of this test is to observe the Nuclear Steam Supply System (NSSS) transient response and the integrated performance of automatic control systems. This test requires the control rods to be in automatic with the reactor at approximately 100% of rated thermal power. The introduction of a 10% load rejection when the reactor is operating at 100% of rated thermal power with the control rods in automatic, will cause the control rods to automatically step in below 215 steps to follow the load.

The 50% load rejection test, an approved Phase III test, is part of the Westinghouse start-up test program to verify design and meet contractural obligations. The purpose of this test is to demonstrate the ability of the NSSS, automatic reactor control systems and secondary plant to sustain a rapid reduction of approximately 50% in electrical output.

A001
1/0

This test requires the control rods to be in automatic with the reactor at approximately 100% of rated thermal power. The introduction of a 50% load rejection, when the reactor is operating at 100% of rated thermal power with the control rods in automatic, will cause the control rods to automatically step in below 215 steps to follow the load.

The above tests are transient conditions initiated by SCE&G to meet commitments and complete the Phase III test program. It is our position that License Condition 2.C(22) is intended for normal plant operations and that the load swing/load rejection tests as such do not violate the intent of the License Condition. Therefore, we request Staff written concurrence in our interpretation of this condition. Your expeditious review of this matter is appreciated.

If you have any questions, please contact us.

Very truly yours,

O. W. Dixon, Jr.

WRM:NEC:OWD/fjc
cc: V. C. Summer
T. C. Nichols, Jr./O. W. Dixon, Jr.
E. H. Crews, Jr.
E. C. Roberts
H. N. Cyrus
J. P. O'Reilly
Group/General Managers
O. S. Bradham
R. B. Clary
C. A. Price
A. R. Koon
C. L. Ligon (NSRC)
G. J. Braddick
J. C. Miller
J. L. Skolds
J. B. Knotts, Jr.
NPCF
File (Lic./Eng.)