



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4040

John L. Skolds
Vice President
Nuclear Operations

JUL 26 1991

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

Attention: Mr. G. F. Wunder

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
POSITION ON NUREG-0737 (MRB 891105)

As a result of discussing the following matter with Mr. R. C. Haag (Senior Resident Inspector) and George Wunder (Project Manager), South Carolina Electric & Gas Company (SCE&G) is submitting this letter to state its position regarding the requirements of NUREG-0737, Item II.D.3.

The requirements of NUREG-0737, Item II.D.3 are stated as follows:

Position

Reactor Coolant System relief and safety valves shall be provided with a positive indication in the control room derived from a reliable valve-position detection device or a reliable indication of flow in the valve discharge pipe.

There is also a statement of clarification:

Clarification

1. The basic requirement is to provide the operator with unambiguous indication of valve position (open or closed) so that operator actions can be taken.

Virgil C. Summer Nuclear Station (VCSNS) utilizes seismically qualified acoustic monitors on each safety valve tailpipe to satisfy the requirements of Item II.D.3. During two events at VCSNS where a pressurizer safety valve actually lifted (ref. LERs 89-011 and 89-015), it was noted that the acoustic monitors for the other two safety valves indicated a partial opening of their respective valves due to the noise transmitted from the lifted valve. Even though these indications did not impact the course or outcome of either event, VCSNS management requested that the indications, as received, should be examined against their design requirements.

9107290223 910726
PDR ADOCK 05000395
P PDR

A046
110

A review of SCE&G's design with respect to Item II.D.3 was evaluated, yielding the following results:

1. The Acoustic Monitoring System does provide unambiguous indication and alarm that at least one pressurizer safety valve is open.
2. It also provides unambiguous indication that all pressurizer safety valves are closed.
3. The procedurally prescribed actions for a lifted pressurizer safety valve are continuous actions that are to be followed until all valves indicate closed.

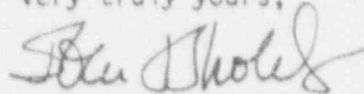
Therefore, the safety significance of the requirement for a "reliable indication of flow in the valve discharge pipe" only involves the ability to have accurate indication of both "no flow" and "any flow" conditions. The present acoustic monitoring system meets these requirements.

This determination is supported by Regulatory Guide 1.97 which classifies the pressurizer safety valve status as a variable with a required range of indication of closed/not closed.

In conclusion, SCE&G takes the position that the Acoustic Monitoring System fully meets the indication requirements of NUREG-0737, Item II.D.3, for the pressurizer safety valve position.

If you should have any questions concerning this matter, please contact David Haile at (803) 345-4322.

Very truly yours,



John L. Skolds

DCH:JLS:grs

c: O. W. Dixon Jr.
R. R. Mahan
R. J. White
S. D. Fbnetter
General Managers
NRC Resident Inspector
J. B. Knotts Jr.
NSRC
File (819.31)