



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4001

John L. Skolds
Senior Vice President
Nuclear Operations

October 17, 1994
Refer to: RC-94-0271

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

Attention: Mr. G. F. Wunder

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RELOCATION OF SEISMIC MONITORING INSTRUMENTATION
FROM TECHNICAL SPECIFICATIONS

South Carolina Electric and Gas Company (SCE&G) requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS). The proposed amendment will relocate the Seismic Monitoring Instrumentation Limiting Condition for Operation, Surveillance Requirements, and associated tables and bases contained in TS section 3/4.3.3 to the Final Safety Analysis Report (FSAR) or an equivalent controlled document. Removal of seismic monitoring instrumentation information is consistent with Criterion 1 of the Nuclear Regulatory Commission (NRC) policy statement, "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," dated July 22, 1993. The policy statement says if a TS does not meet any of the four criteria listed it may be relocated. Criterion 1 states in part "....This criterion should not, however, be interpreted to include instrumentation to detect precursors to reactor coolant pressure boundary leakage or instrumentation to identify the source of actual leakage (e.g. loose parts monitor, seismic instrumentation, valve position indicators)."

In addition, SCE&G's desire to remove seismic monitoring instrumentation from TS was discussed with Mr. George Wunder of the NRC. SCE&G plans to upgrade the existing seismic monitoring instrumentation system (SMIS) during the next operating cycle and through Refueling Outage 9 (scheduled for Spring 1996). The upgrade will replace and/or remove some existing components utilizing newer technology, however, the overall system will satisfy all functional requirements contained in the current TS and FSAR. Relocation of the TS to the FSAR or an equivalent controlled document allows SCE&G to perform the SMIS upgrade under 10CFR50.59 without requesting several TS changes during the upgrade process. Mr. Wunder recommended that SCE&G review and utilize the approach followed by PECO Energy Company (Limerick Station). PECO is performing a similar SMIS upgrade and approval from the NRC to relocate their SMIS TS was received on August 29, 1994.

Information supporting this TS change request is contained in the following attachments:

Attachment I	-	Proposed TS change
Attachment II	-	Description of Amendment Request and Supporting Safety Evaluation
Attachment III	-	Description of Amendment Request and the Associated No Significant Hazards Evaluation



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An additional reason for requesting the TS change at this time is the impact of replacing Steam Generators (SGs), presently in progress, on one of the seismic monitors listed in TS Tables 3.3-7 and 4.3-4 (SG "B" Triaxial Peak Accelerograph [TPA]). The SG replacement outage requires removal of the TPA for about three months and then reinstallation on or near the new SG. As part of the SMIS upgrade, SCE&G intends to remove the obsolete TPA from the system altogether. Therefore, the cost of reinstalling the SG "B" TPA for one operating cycle is not justified. The concept of deletion of the obsolete TPA has been discussed with the NRC. Once the TS change is approved by the NRC, SCE&G can evaluate deletion of the TPA under 10CFR50.59.

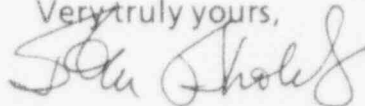
For the reasons provided above, SCE&G requests approval of this TS change prior to the restart from the Fall 1994 SG replacement outage (approximately December 17, 1994). Also, please note this TS change request affects one page (B3/4 3-3) of a previously submitted TS change request (TSP 930011 dated December 17, 1993).

The proposed TS change has been reviewed and approved by the Plant Safety Review Committee and Nuclear Safety Review Committee.

I declare that the statements and matters set forth herein are true and correct to the best of my knowledge, information, and belief.

If you have any questions, please contact Ms. April R. Rice at (803) 345-4232.

Very truly yours,



John L. Skolds

ARR/JLS/nkk
Attachments

c: O. W. Dixon
R. R. Mahan (w/o Enclosures)
R. J. White
S. D. Ebner
NRC Resident Inspector
J. B. Knotts Jr.
M. K. Batavia (DHEC)
Central File System
RTS (TSP 940004, REM-6000)
File (813.20, 810.39)