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PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP 900004-1
VIRGIL C. SUMNER NUCLEAR STATION

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ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of a multi-disciplined dedicated onsite group with a minimum assigned complement of five engineers or appropriate specialists.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for procedure revisions, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the General Manager, Nuclear Safety.

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 letter to all licensees as clarified in NUREG-0737, Section 1.A.2.1, except for the Associate Manager, Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, ~~September 1975~~, the Shift Technical Advisor who shall meet or exceed the qualifications referred to in Section 2.2.1.b of Enclosure 1 of the October 30, 1979 NRC letter to all operating nuclear power plants, and the members of the Independent Safety Engineering Group, each of whom shall have a Bachelor of Science degree or registered Professional Engineer and at least two years experience in their field. At least one year experience shall be in the nuclear field.

6.4 TRAINING

6.4.1 ~~Retraining and replacement training programs for the unit staff shall be maintained and shall meet or exceed the requirements and recommendations of Sections 5.2 and 5.5 of ANSI 3.1-1981 and 10 CFR 55.59 as committed to in Appendix 3A of the Final Safety Analysis Report.~~

licensed
↑
INSERT

*Not responsible for sign-off function.

Revision 2, April 1987

Insert for TS 6.4

(c) and 55.31(a)(4). For positions other than the unit licensed staff, training and replacement training programs shall meet or exceed the requirements of Regulatory Guide 1.8, Revision 2, April 1987.

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DESCRIPTION AND SAFETY EVALUATION
TS 6.4 TRAINING

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS TS to revise TS 6.3, "Unit Staff Qualifications," and TS 6.4, "Training," to reflect that the non-licensed unit staff qualifications and training programs meet the requirements of RG 1.8, Revision 2, that licensed unit staff meet the requirements of 10CFR55 and to delete references to superseded requirements. VCSNS has INPO accredited training and requalification programs based on the systems approach to training. Title 10, CFR, Parts 55.31 and 55.59, allows licensees to use accredited training and requalification programs. NUREG 1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," asserts that an INPO accredited program does not constitute a decrease in the scope, content, or frequency of requalification training programs.

SAFETY EVALUATION

VCSNS personnel selection and training programs comply with the guidance of RG 1.8, Revision 2, April 1987. VCSNS has substituted its initial and requalification training programs, previously approved by the NRC, with INPO accredited training programs. The training programs are enhanced by the use of the systems approach to training. These programs implement the INPO "Guidelines for Continuing Training of Licensed Personnel," INPO 86-025.

The proposed change is administrative in nature because the change deletes references to requirements superseded by the issuance of 10CFR55 and RG 1.8, Revision 2.

The proposed change does not alter the plant configuration and requirements, methods and manner of plant operation, or affect any technical specification margin of safety.

Therefore, this amendment request does not adversely affect or endanger the health or safety of the general public and does not involve an unreviewed safety question.

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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS TS to revise TS 6.3, "Unit Staff Qualifications," and TS 6.4, "Training," to reflect that the non-licensed unit staff qualifications and training programs meet the requirements of RG 1.8, Revision 2, that licensed unit staff meet the requirements of 10CFR55 and to delete references to superseded requirements. VCSNS has INPO accredited training and requalification programs based on the systems approach to training. Title 10, CFR, Parts 55.31 and 55.59, allows licensees to use accredited training and requalification programs. NUREG 1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," asserts that an INPO accredited program does not constitute a decrease in the scope, content, or frequency of requalification training programs.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided certain examples (51 FR 7744) of actions likely to involve no significant hazards considerations. The proposed amendment to Section 6.4 is consistent with example (i) which states, "A purely administrative change to TS: for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature." SCE&G has determined that a no significant hazards evaluation is justified and that should this request be implemented it will not:

1. Involve a significant increase in the probability or consequences of any accident previously evaluated because no plant equipment has been changed. This amendment is an administrative change involving the deletion of superseded requirements and incorporation of the revised regulation in 10CFR55 and RG 1.8, Revision 2.
2. Create the possibility of a new or different kind of accident from any previously evaluated because the proposed amendment is an administrative change involving the deletion of superseded documents and incorporation of revised regulation. No physical plant configuration, setpoint, or operation changes are proposed.
3. Involve a significant reduction in a margin of safety because this amendment is an administrative change involving the deletion of superseded requirements and the incorporation of revised regulation in 10CFR55 and RG 1.8, Revision 2.