

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

March 30, 1984

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 Condition
2.C.15

Dear Mr. Denton:

South Carolina Electric and Gas Company (SCE&G), in a November 6, 1981 letter to the Staff, committed to install power lockout devices in the control room for the Residual Heat Removal System (RHRS) suction isolation valves prior to startup after the first refueling. This commitment was made to satisfy NRC concerns relating to Branch Technical Position RSB 5-1 and was subsequently incorporated as License Condition 2.C.15.

Based on further review of this commitment, SCE&G has determined that this design modification may violate 10CFR PART 50, APPENDIX R. A fire in the Control Building could conceivably cause both RHRS suction isolation valves to open while the Reactor Coolant System (RCS) is at a pressure greater than the RHRS design pressure, which could result in a LOCA outside containment. Presently, the circuit breakers are administratively locked open at the motor control centers during normal operation.

Accordingly, an amendment to the Operating License is requested which would delete the requirement to implement this design modification. As requested by the Staff, the following information is provided in support of this License Amendment.

As shown on FSAR Figure 1.2-15, the Main Control Room is located on the 463' elevation of the Control Building. The breaker for valve 8701A is powered from Motor Control Center XMCLDA2X. This Motor Control Center is located in the switchgear room on the 463' elevation of the Intermediate Building (see FSAR Figure 1.2-13). Due to the close proximity to the Main Control Room, an operator could be dispatched from the Main Control Room and perform the necessary actions to unlock and close this breaker in approximately five minutes. The valve

8404050210 840330
PDR ADOCK 05000395
P PDR

Rec'd w/ Hock #4,000

Acc 1
1/0

Mr. Harold R. Denton
Operating License Condition 2.C.15
March 30, 1984
Page #2

can then be operated from the Control Room.

The breaker for valve 8701B is powered from Motor Control Center XMClDA2Y which is located in the switchgear room on the 412' elevation of the Auxiliary Building (see FSAR Figure 1.2-4). The breakers for valves 8702A and 8702B are powered from Motor Control Center XMClDBZY which is located on the 463' elevation of the Auxiliary Building (see FSAR Figure 1.2-6). It is estimated that approximately ten minutes would be required for an operator to proceed from the Main Control Room to the above described breaker locations and to perform the necessary actions to unlock and close the breakers allowing the valves to be operated from the Control Room.

The additional time that is required to operate these breakers locally is insignificant compared with the time available to perform the necessary actions when proceeding to cold shutdown and is not operationally limiting.

It should be noted that during normal plant operations there are auxiliary operators stationed at various locations throughout the plant including the Auxiliary and Intermediate Buildings. If these personnel were utilized to perform the above required actions, the estimated times could be reduced.

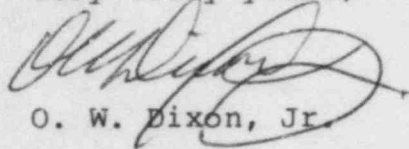
The most direct route for an operator to proceed to the different breaker locations would not require passing through an area in which high radiation or other adverse environmental conditions would normally occur. In addition, there are other diverse routes to these locations which do not require proceeding through adverse conditions.

Because these valves can be operated from the Main Control Room after the breakers have been locally operated, and because of the minimal time required to unlock and close these breakers, SCE&G has determined that a finding of no significant hazards is appropriate. This License Amendment has been reviewed and approved by both the Plant Safety Review Committee and the Nuclear Safety Review Committee. A check in the amount of Four Thousand Dollars (\$4000.00) is provided to process this amendment.

Mr. Harold R. Denton
Operating License Condition 2.C.15
March 30, 1984
Page #3

Should you have any questions or comments, please advise.

Very truly yours,



O. W. Dixon, Jr.

AMP/OWD/gj

cc: V. C. Summer
T. C. Nichols, Jr./O. W. Dixon, Jr.
E. H. Crews, Jr.
E. C. Roberts
W. A. Williams, Jr.
D. A. Nauman
J. P. O'Reilly
Group Managers
O. S. Bradham
C. A. Price
C. L. Ligon (NSRC)
K. E. Nodland
R. A. Stough
G. Percival
C. W. Hehl
J. B. Knotts, Jr.
NPCF
File