



South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
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S. A. Byrne
General Manager,
Nuclear Plant Operations

February 10, 1996
RC-96-0035

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

Attention: Ms. Tilda Y. Liu

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
EMERGENCY TECHNICAL SPECIFICATION CHANGE REQUEST
TSP 960002, CHARCOAL FILTERS

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby requests an emergency amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) in accordance with 10CFR50.90. The proposed changes will revise the testing methodology utilized by VCSNS to determine the operability of the charcoal filters in the engineering safeguards features (ESF) air handling units.

Currently, the station tests the charcoal in the ESF air handling units per ANSI N509-1980. Although this method of testing provides better assurance that these air handling units will perform their design function, it does not meet the requirements of the TS. Therefore, an emergency TS amendment is being submitted to recognize current testing methodology to preclude an unnecessary plant shutdown. A significant reduction in public health and safety does not exist. The justification for an emergency TS change is attached.

TS pages 3/4 7-15 and 3/4 9-13, relating to Surveillance Requirements for charcoal filter laboratory testing, are being revised such that existing flawed test methodology in the TS will reflect the currently utilized acceptable test methodology in accordance with industry standards. SCE&G is currently aware that the NRC believes that ASTM D 3803-1989 is the preferred test methodology. An additional submittal will be forthcoming to incorporate this standard into our TS.

The TS change request (TSCR) is contained in the following attachments:

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|----------------|--|
| Attachment I | Explanation of Changes Summary
Marked-up Technical Specification Pages
Revised Technical Specification Pages |
| Attachment II | Justification for Emergency Action |
| Attachment III | Safety Evaluation |
| Attachment IV | No Significant Hazards Determination |
| Attachment V | Environmental Impact Determination |

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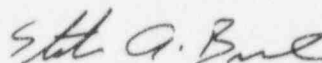
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This proposed TSCR has been reviewed and approved by the Plant Safety Review Committee and the Nuclear Safety Review Committee.

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

Should you have questions, please call Mr. Michael Zaccone at (803) 345-4328.

Very truly yours,



S. A. Byrne

MJZ/GJT/dr
Attachments (4)

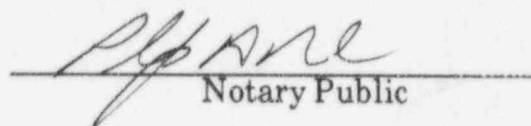
c: J. L. Skolds (w/o Attachments)
O. W. Dixon
R. R. Mahan (w/o Attachments)
R. J. White
Roy P. Zimmerman
Frederick J. Hebdon
John J. Hayes, Jr

S. D. Ebnetter
NRC Resident Inspector
J. B. Knotts Jr.
M. K. Batavia
K. R. Jackson
DMS
RTS (TSP 960002)
File (813.20)

STATE OF SOUTH CAROLINA :
: TO WIT :
COUNTY OF FAIRFIELD :

I hereby certify that on the 10th day of FEB 1996, before me, the subscriber, a Notary Public of the State of South Carolina, personally appeared Stephen A. Byrne being duly sworn, and states that he is General Manager, Nuclear Plant Operations of the South Carolina Electric & Gas Company, a corporation of the State of South Carolina, that he provides the foregoing response for the purposes therein set forth, that the statements made are true and correct to the best of his knowledge, information, and belief, and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal


Notary Public

My Commission Expires

July 13, 2005

SCE&G -- Explanation of Changes Summary

<u>PAGE</u>	<u>Affected Section</u>	<u>Bar #</u>	<u>Description of Change</u>	<u>Reason for Change</u>
3/4 7-15	4.7.6.c.2	1	Replaced words: "Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978." with: "ANSI N509-1980, at a relative humidity of 70% and 25°C with a methyl iodide penetration of <1%."	To reflect a proposed change to the testing criteria stated in Technical Specifications for the testing of carbon samples from the Control Room Emergency Ventilation System charcoal adsorbers.
	4.7.6.d	2	Replaced words: "Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978." with: "ANSI N509-1980, at a relative humidity of 70% and 25°C with a methyl iodide penetration of <1%."	To reflect a proposed change to the testing criteria stated in Technical Specifications for the testing of carbon samples from the Control Room Emergency Ventilation System charcoal adsorbers.
3/4 9-13	4.9.11.b.2	1	Replaced words: "Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978." with: "ANSI N509-1980, at a test media temperature of 30°C."	To reflect a proposed change to the testing criteria for the testing of carbon samples from the Fuel Handling Building Exhaust System charcoal adsorbers.
	4.9.11.c	2	Replaced words: "Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978." with: "ANSI N509-1980, at a test media temperature of 30°C."	To reflect a proposed change to the testing criteria for the testing of carbon samples from the Fuel Handling Building Exhaust System charcoal adsorbers.