

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

April 29, 1985

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

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Deletion of Technical
Specification Table 3.8.1

Dear Mr. Denton:

South Carolina Electric & Gas Company (SCE&G) hereby requests a revision to Technical Specification 3/4.8.4, "Electrical Equipment Protective Devices." This proposed revision, as shown in the attached marked-up Technical Specification pages, deletes Table 3.8.1, "Containment Penetration Conductor Overcurrent Protective Device Test Setpoint Criteria" and revises Specification 3/4.8.4 to indicate which devices are required to be operable. The revision also incorporates the administrative page numbering changes to the Index and Technical Specification pages necessary as a result of deleting the table.

The devices comprising Table 3.8.1 are those containment penetration conductor overcurrent protective devices which are required for penetration protection. The specific test setpoint and response time for each of these devices was established by engineering evaluation and vendor supplied recommendations. SCE&G's position is that the table itself is not necessary, provided Specification 3/4.8.4 specifies that those devices required to be operable to provide containment overcurrent protection are to be tested in accordance with the Technical Specification.

SCE&G has determined that a finding of no significant hazards is appropriate for this proposed amendment. The request does not involve a significant increase in the probability or consequences of an accident previously evaluated because the Technical Specification surveillances for required protection devices remain unchanged. The possibility of a new or different kind of accident from any accident previously evaluated is not created because the physical plant design is not altered by deleting the table. Also the change will not involve a significant reduction in a margin of safety because all containment penetration conductor overcurrent protective devices required for penetration protection will be demonstrated as operable using setpoints and response times determined by engineering evaluation and vendor supplied information. These setpoints and required response times are established to ensure the devices are able to provide penetration protection.

This change has been reviewed and approved by both the Plant Safety Review Committee and the Nuclear Safety Review Committee. Please find enclosed the application fee of one hundred fifty dollars (\$150.00) required by Title 10 of the Code of Federal Regulations.

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If you should have any questions, please advise.

Very truly yours,



O. W. Dixon, Jr.

AMM:OWD:rh

Enclosures

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