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John L. Skolds
Vice President
Nuclear Operations

NOVEMBER 13, 1992

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
TECHNICAL SPECIFICATIONS CHANGE REQUEST - MAIN STEAM SAFETY VALVE
SETPOINT TOLERANCE CHANGE (TSP 880018-3)

South Carolina Electric & Gas Company (SCE&G) submitted an amendment request to License NPF-12 to change the Technical Specifications (TS) for the Virgil C. Summer Nuclear Station (VCSNS) in letters dated February 4, 1991, and September 9, 1992.

The amendment request involves increasing the allowed tolerance of the Main Steam Safety Valves (MSSVs) from $\pm 1\%$ to $\pm 3\%$. SCE&G has performed a safety evaluation and a No Significant Hazards Determination as required by the Code of Federal Regulations, and determined that the amendment posed no safety concerns. Even though the evaluation supports a $\pm 3\%$ tolerance, NRC's preference is that VCSNS reset the valve any time the as-found lift pressure is beyond $\pm 1\%$ tolerance. SCE&G's position is that if the as-found lift pressure is within the $\pm 3\%$ tolerance, the valve does not require any adjustments.

In order to resolve the NRC's concern, SCE&G made a commitment in the September 9, 1992, letter to reset the MSSVs to within the $\pm 1\%$ tolerance if the as-found lift pressure is beyond the $\pm 3\%$ tolerance. The NRC has now subsequently stated that regardless of any technical evidence which supports SCE&G's position, their policy will not allow approval of the amendment without the agreement to reset the MSSVs any time the as-found lift pressure is outside the $\pm 1\%$ tolerance.

SCE&G hereby requests that this letter and the attached marked up page from Technical Specifications be accepted as an amendment to the previous submittals for the purpose of documenting SCE&G's agreement to reset any MSSVs when surveillance testing discovers that the as-found lift pressure is beyond $\pm 1\%$ tolerance.

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

Any questions concern ng this matter should be directed to Mr. David Haile at (803) 345-4322.

Very truly yours,

Gary Taylor
John L. Skolds J.L. Skolds

DCH:lcd

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RTS (TSP 880018)
File (813.20)