

June 27, 1985

Mr. O. W. Dixon, Jr., Vice President
Nuclear Operations
South Carolina Electric and Gas Company
Post Office Box 764
Columbia, South Carolina 29218

DISTRIBUTION:

✓ Docket Files
NRC PDR
Local PDR
PRC System

Dear Mr. Dixon:

Subject: Virgil C. Summer Nuclear Station Facility Operating
License NPF-12

Reference: (a) Letter dated April 4, 1985, from O. W. Dixon, Jr., (SCE&G)
to H. R. Denton, (NRC)

By reference (a), you submitted information concerning the V. C. Summer Technical Specifications governing the use of overtime. Some of that information seems to be contradictory.

Section 6.2.2.f.d of the Technical Specifications states, "Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift." However, the final paragraph of Section 6.2.2.f states, "Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Manager, Virgil C. Summer Nuclear Station or his designee to assure that excessive hours have not been assigned." These two statements are contradictory since, in the latter statement, no exception is made to dispense with the monthly review during periods of extended shutdown.

It is our opinion that the intent of the NRC overtime policy expressed in Generic Letter 82-12 can be achieved if the Manager's monthly review of individual overtime is dispensed with during extended shut down periods. The monthly reviews would be required at all other times. The V. C. Summer Technical Specifications should be changed so that the existing contradiction is removed.

Any questions should be addressed to the project manager assigned to your plant.

Sincerely,

B507110020 B50627
PDR ADDCK 05000395
P PDR

Original Signed by
Carl R. Stahle

Blair G. Adensam, Chief
Licensing Branch No. 4
Division of Licensing

cc: See next page

DL:LB #4
JHopkins:c1
6/26/85

LA:DL:AR #4
MDuncan
6/26/85

C:DL:LB #4
EAdensam
6/26/85

AD:L:DL
TNovak
1/7/85

SUMMER

Mr. O. W. Dixon, Jr.
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
P.O. Box 764 (Mail Code 167)
Columbia, South Carolina 29218

cc: Mr. William A. Williams, Jr.
Technical Assistant, Nuclear Operations
Santee Cooper
P.O. Box 764 (Mail Code 167)
Columbia, South Carolina 29218

J. B. Knotts, Jr., Esq.
Bishop, Liberman, Cook, Purcell
and Reynolds
1200 17th Street, N.W.
Washington, D. C. 20036

Mr. Mark B. Whitaker, Jr.
Group Manager - Regulatory and
Support Services
South Carolina Electric & Gas Company
P.O. Box 764 (Mail Code 160)
Columbia, South Carolina 29218

Resident Inspector/Summer NPS
c/o U.S. Nuclear Regulatory Commission
Route 1, Box 64
Jenkinsville, South Carolina 29065

Regional Administrator
U.S. Nuclear Regulatory Commission,
Region II
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323

Chairman, Fairfield County Council
P.O. Box 293
Winnsboro, South Carolina 29180

Attorney General
Box 11549
Columbia, South Carolina 29211

Mr. Heyward G. Shealy, Chief
Bureau of Radiological Health
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201