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March 25, 1997 RC-97-0058

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

Subject:

VIRGIL C. SUMMER NUCLEAR STATION

DOCKET NO. 50/395

OPERATING LICENSE NO. NPF-12

EMERGENCY ACTION LEVEL PROPOSED CHANGE

ADDITIONAL INFORMATION

Per your request, South Carolina Electric & Gas Company (SCE&G) hereby provides amplifying information on a proposal submitted by letter dated April 15, 1996, to initiate a change to the Virgil C. Summer Nuclear Station (VCSNS) Radiation Emergency Plan revising two Notification of Unusual Event (NUE) Emergency Action Levels (EAL).

The amplifying information is limited to change No. 1 of the proposal which would replace an existing NUE, derived from Appendix 1 to NUREG-0654, with a corresponding NUE, derived from guidance in NUMARC/NESP-007.

The existing NUE states: "INDICATIONS OR ALARMS ON PROCESS OR EFFLUENT PARAMETERS NOT FUNCTIONAL IN THE CONTROL ROOM TO AN EXTENT REQUIRING SHUTDOWN AS PER TECHNICAL SPECIFICATIONS OR OTHER SIGNIFICANT LOSS OF ASSESSMENT OR COMMUNICATIONS CAPABILITY." VCSNS Technical Specifications specify actions to be taken with one or more radiation monitoring channels inoperable. The specified actions do not require a shutdown based on the loss of indications or alarms on process or effluent parameters not functional in the control room. This portion of the existing NUE does not provide practical guidance to personnel responsible to initiate an NUE at VCSNS.

The proposed NUE states: "UNPLANNED LOSS OF ALL ONSITE OR OFFSITE COMMUNICATIONS CAPABILITY." The proposed NUE would provide improved guidance to designate the plant conditions necessary to initiate a NUE based on the loss of communications capability.

SCE&G does not consider the change to constitute a decrease in the effectiveness of the plan and the plan as revised, will continue to meet the standards of 10 CFR 50.47 and the requirements of Appendix E to 10 CFR Part 50.

The proposed change has the support of the state and counties within the primary emergency planning zone as discussed in the original submittal.

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Should there be any questions, please call Mr. Victor Kelley at (803) 345-4464.

Very Truly Yours,

Gary J. Taylor

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