SCE&G®
A SCANA COMPANY

November 17, 2000
RC-00-0356

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
LICENSEE EVENT REPORT (LER 2000-010)
INADEQUATE SURVEILLANCE OF ASME CODE COMPONENTS

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Attached is Licensee Event Report (LER) No. 2000-010-00, for the Virgil C. Summer Nuclear Station (VCSNS). The report describes a failure to perform an adequate surveillance on ASME Code components and is being submitted in accordance with 10 CFR 50.73(A)(2)(I).

Should you have any questions, please call Mr. Mel Browne at (803) 345-4141.

Very truly yours,

Stephen A. Byrne

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NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION
(6-1998)

LICENSEE EVENT REPORT (LER)

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001

Estimated burden per response to comply with this mandatory information collection request: 50.0 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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TITLE

Inadequate ASME Code Visual Examination for Pressure Retaining Components

EVENT DATE			LER NUMBER			REPORT DATE			OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
10	18	2000	2000	-- 010	-- 00	11	17	00	FACILITY NAME	DOCKET NUMBER

OPERATING MODE	6
POWER LEVEL	0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more)

	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
	20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC FORM 366A
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER

NAME	TELEPHONE NUMBER (Include Area Code)
M. N. Browne Manager, Nuclear Licensing & Operating Experience	(803) 345-4141

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
D	SI			N					

SUPPLEMENTAL REPORT EXPECTED			EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On October 18, 2000, South Carolina Electric & Gas Company (SCE&G) personnel identified an inadequate surveillance for visual leakage inspection of components with pressure retaining bolted connections. The inspection of bolted components, in systems borated for the purposes of reactivity control, requires insulation to be removed during the inspection in accordance with ASME Section XI, 1989 Edition, Article IWA-5242(a).

Plant personnel, involved in the visual inspection of Code Class 1 components in the Inservice Test (IST) program, questioned why several check valves were not included. A review of plant drawings found that there were five (5) Code Class 1 check valves that had not been previously identified as having bolted connections covered with insulation.

SCE&G considers the failure to inspect the bolted connections with insulation removed to be a procedure development error. There were no adverse consequences resulting from the failure to inspect these valves with the insulation removed. VCSNS performs a walkdown of areas in the containment each outage looking for degradation that would be indicated by leakage from a borated system. Additionally, the identified components received a visual inspection with the insulation on and the system at rated pressure during each required pressure test for Code Class 1 or 2 systems.

Plant personnel are reviewing design documents to verify that all bolted connections for Class 1 and 2 systems are identified. Any Class 1 surveillance program errors will be corrected prior to the pressure test scheduled at the end of the current refueling outage (RF-12). All Class 2 component inspection errors will receive a visual inspection with insulation removed and the system depressurized prior to the end of RF-12. The applicable surveillance procedures for Code Class 2 components will be corrected by March 1, 2001.

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* **(17)**

PLANT IDENTIFICATION

Westinghouse - Pressurized Water Reactor

EQUIPMENT IDENTIFICATION

XVC08973A-SI – RCS Loop A Cold Leg Inlet Header Check Valve	EIIS Code AB
XVC08973B-SI – RCS Loop B Cold Leg Inlet Header Check Valve	EIIS Code AB
XVC08973C-SI – RCS Loop C Cold Leg Inlet Header Check Valve	EIIS Code AB
XVC08988A-SI – RHR Supply Header Check Valve	EIIS Code BP
XVC08988B-SI – RHR Supply Header Check Valve	EIIS Code BP

IDENTIFICATION OF EVENT

During preparation for a visual inspection of pressure retaining bolted connections, in systems borated for the purposes of reactivity control, plant personnel identified five (5) Code Class 1 valves that had not previously been inspected. This inspection is performed with piping insulation removed, during each plant outage, in accordance with ASME Section XI, subparagraph IWA-5242(a).

EVENT DATE

October 18, 2000

REPORT DATE

November 17, 2000

This Licensee Event Report was initiated by Condition Evaluation Report (CER) 00-1479.

CONDITIONS PRIOR TO EVENT

Mode 6 – Refueling (0% - RCS Depressurized)

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DESCRIPTION OF EVENT

On October 18, 2000, South Carolina Electric & Gas Company (SCE&G) personnel identified an inadequate surveillance of components with pressure retaining bolted connections. The inspection of bolted components, in systems borated for the purposes of reactivity control, requires insulation to be removed during the inspection in accordance with ASME Section XI, 1989 Edition, Article IWA-5242(a).

Plant personnel, involved in the visual inspection of Code Class 1 components in the Inservice Test (IST) program, questioned why several check valves were not included. A review of plant drawings found that there were five (5) Code Class 1 check valves that had not been previously identified as having bolted connections covered with insulation.

CAUSE OF EVENT

SCE&G considers the failure to inspect the applicable bolted connections, with insulation removed, to be a procedure development error. General Test Procedure (GTP) 304, "Inservice Inspection System Pressure Testing Second Ten Year Interval," provides controls for System Pressure Tests and Visual Examinations required by ASME Section XI on Code Class 1, 2, and 3 Pressure Retaining Components. GTP-304 also contains a relief request, with an attached list of Code Class 1 and 2 components, which authorized an alternate test for insulated bolted connections. This test is performed at atmospheric or static pressure for the applicable insulated bolted connections inside containment with the insulation removed. The list of components, attached to this relief request, became the approved inspection scope for the implementing Surveillance Test Procedures.

Personnel that compiled the list of components, covered by the relief request submitted to the NRC on December 20, 1995, failed to perform an adequate review of plant documents. Due to this error, the identified check valves remained in the group of components that received a visual examination to locate evidence of leakage without removing insulation and while at system pressure.

ANALYSIS OF EVENT

There were no adverse consequences resulting from the failure to inspect these valves with the insulation removed. VCSNS performs a walkdown of areas in the containment each outage looking for degradation that would be indicated by leakage from a borated system. Additionally, each of the identified components received a visual inspection with the insulation on and the system at rated pressure during each required pressure test for Code Class 1 and 2 system.

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* (17)

CORRECTIVE ACTIONS

Code Class 1 - Upon determination that a deficiency existed in the implementing surveillance program for ASME Section XI Code Class 1 pressure retaining bolted connections, plant personnel initiated a review of design documents to identify all bounded components. This review has determined that the five (5) check valves that were initially identified were the only Code Class 1 bolted components that had not previously received a visual inspection with the insulation removed. These valves will be inspected prior to the end of RF-12. The insulation will be removed and the system depressurized during this inspection. This inspection is to insure that there is no previously unidentified leakage. The applicable surveillance procedures will then be corrected by March 1, 2001 to conform to ASME Section XI or an amended relief request.

Code Class 2 – VCSNS personnel initiated a review of design documents for all applicable ASME Section XI, Code Class 2 components to identify bounded components in Class 2 systems. Any surveillance errors on Code Class 2 components will be identified and visually inspected. The insulation will be removed and the system depressurized during this inspection. This inspection is to insure that there is no previously unidentified leakage and will be completed prior to the completion of RF-12. The applicable surveillance procedures will then be corrected by March 1, 2001 to conform to ASME Section XI requirements or an amended relief request.

PRIOR OCCURENCES

None