



Ronald B. Clary
Vice President
New Nuclear Deployment

August 29, 2012
NND-12-0418

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Docket Numbers 52-027 and 52-028
Reply to a Notice of Violation

The U.S. Nuclear Regulatory Commission (NRC) issued Integrated Inspection Report Nos. 05200027/2012-003, 05200028/2012-003 and Notice of Violation on August 6, 2012. The report documented NRC inspections conducted during the Second Quarter of 2012 (April 1, 2012 – June 30, 2012).

The inspection report identified one finding, with an associated violation, that was evaluated under the construction significance determination process as having very low safety significance (Green). The enclosure to this letter provides the South Carolina Electric & Gas reply to the Notice of Violation.

This letter contains no NRC commitments.

If you have any questions regarding this letter, please contact Mr. Alfred M. Paglia, Manager – Nuclear Licensing, at 803-941-9876.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of August 2012.

Sincerely,

Ronald B. Clary
Vice President
New Nuclear Deployment

GS/RBC/gs

Enclosure

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South Carolina Electric & Gas

Enclosure to Letter NND-12-0418

Reply to a Notice of Violation

05200027/2012-003-02 and 05200028/2012-003-02

Reply to a Notice of Violation
05200027/2012-003-02 and 05200028/2012-003-02

This enclosure provides the South Carolina Electric & Gas Company (SCE&G) reply to a Notice of Violation (NOV) issued to SCE&G by the Nuclear Regulatory Commission (NRC) for the V.C. Summer Nuclear Station Units 2 and 3 in a letter dated August 6, 2012. The NOV was identified during NRC inspections conducted in the Second Quarter of 2012 (April 1, 2012 – June 30, 2012).

Violation 05200027/2012-003-02 and 05200028/2012-003-02 states:

Criterion XVII, Quality Assurance Records, of 10 CFR Part 50, Appendix B, requires, in part, that sufficient records be maintained to furnish evidence of activities affecting quality.

Section 17.2 of the South Carolina Electric & Gas Co., V.C. Summer Units 2 and 3 Quality Assurance Program Description, Revision 2, states in part, that the licensee will manage the storage of QA Records in electronic media consistent with Nuclear Information and Records Management Association Guideline TG 11-1998.

Nuclear Information and Records Management Association Guideline TG 11-1998, Authentication of Records and Media, Section 4.1, stated that records should be considered valid for storage only if properly authenticated by the organization initiating, reviewing, and/or completing the record. Definition 2.1 stated in part, that authentication is the process whereby a record is confirmed to be in complete and exact accordance with fact or reality.

Contrary to the above, on or before May 18, 2012, the licensee failed to adequately ensure that quality assurance records converted into electronic format were sufficient to furnish evidence of activities affecting quality. Specifically, procedure QSI-17.1, Quality Assurance Records Processing, Revision C, did not provide sufficient measures to ensure that all pages contained in document packages were exactly in accordance with the source document.

This violation is associated with a Green construction significance determination process finding and has been identified as Violation 05200027/2012-003-02, 05200028/2012-003-02.

Reason(s) for Violation 05200027/2012-003-02 and 05200028/2012-003-02:

SCE&G accepts the NOV. The deficiency described in the NOV was evaluated using the Shaw and SCE&G Corrective Action Programs in Shaw Corrective Action Report (CAR) 2012-0533 and SCE&G Condition Report 12-0283. The CAR 2012-0533 investigation determined that scanning problems related to documents with water damage resulted in missing pages in electronic copies of some hard copy documents.

In addition, lack of pagination in documents made it difficult to confirm that hard copy documents had been properly scanned into electronic documents.

Corrective Steps Taken and Results Achieved:

- (1) Shaw has briefed Shaw Quality Assurance (QA) and Quality Control (QC) personnel on the importance of ensuring that QA documents are kept in an environment that will minimize damage.
- (2) Shaw has revised Shaw Quality Site Instruction (QSI) 17.1, Quality Assurance Records Processing, to include direction that requires the record source to ensure records packages are paginated prior to transmitting the package to Shaw Quality Services for scanning into electronic documents.
- (3) Shaw Quality Services personnel have been coached on the importance of ensuring that hard copy documents scanned into electronic documents match.
- (4) Shaw performed a comprehensive review of hard copy documents vs. electronic documents generated by Shaw QA/QC. The review included inspection reports, inspection plans, nonconformance and disposition reports, risk releases, non-destructive examination reports, civil test reports, Measurement and Test Equipment Calibration Records, and QSIs. This review identified some additional document scanning discrepancies that have been corrected.

Corrective Steps to be Taken:

The corrective actions identified above have been completed.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on August 28, 2012, with completion of the corrective actions identified above.