



Ronald B. Clary
Vice President
New Nuclear Deployment

September 26, 2012
NND-12-0486

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 – Supplement

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 enclosure to this letter amends and provides additional information on the South Carolina Electric & Gas (SCE&G) reply to the Notice of Violation, which was submitted by letter dated August 29, 2012 (SCE&G letter NND-12-0418).

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 26th day of September 2012.

Sincerely,

Ronald B. Clary
Vice President
New Nuclear Deployment

GS/RBC/gs

Enclosure

*IEDI
NRO*

c: Victor McCree
Rahsean Jackson
Patrick Donnelly
Michael Magee
Denise McGovern
Jim Reece
Stephen A. Byrne
Jeffrey B. Archie
Ronald A. Jones
Ronald B. Clary
William M. Cherry
Alvis J. Bynum
Kathryn M. Sutton
Daniel Patton
Joel Hjelseth
Brian McIntyre
William A Fox, III
Charles Baucom
VCSummer2&3ProjectMail@Shawgrp.com
Vcsummer2&3project@westinghouse.com
DCRM-EDMS@SCANA.CO

South Carolina Electric & Gas

Enclosure to Letter NND-12-0486

Reply to a Notice of Violation – Amendment

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

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

This enclosure provides the amended 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).

The amendment provides additional information regarding Item Number 2 under “Corrective Steps Taken and Results Achieved” and a revised compliance date based on the additional information.

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 entered in the Shaw and SCE&G Corrective Action Programs in Shaw Corrective Action Reports (CAR) 2012-0533 and 2012-1151 and SCE&G Condition Reports 12-0283 and 12-0606. 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 a requirement to paginate documents prior to transmission to Shaw Quality Services for retention to mitigate the risk of missing pages in scanned documents. In addition, QSI-17.1, has been reviewed by Shaw against the records authentication guidance of Nuclear Information and Records Management Association (NIRMA) Guideline TG11-1998, and revised appropriately to ensure QA records in electronic media are authenticated in a manner that is consistent with the intent of the NIRMA guideline.
- (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 September 25, 2012, with completion of the corrective actions identified above.