George A. Lippard
Vice President, Nuclear Operations
803.345.4810

SCE&G®
A SCANA COMPANY

September 6, 2017
RC-17-0126

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

Dear Mr. Masters:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS), UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
REPLY TO A NOTICE OF VIOLATION

References:

Anthony D. Masters, Chief, NRC to George A. Lippard III, SCE&G, "NRC Integrated Inspection Report 05000395/2017002 and Notice of Violation", dated August 9, 2017 [ML17221A115]

By letter dated August 9, 2017, titled "NRC Integrated Inspection Report 05000395/2017002 and Notice of Violation", the Nuclear Regulatory Commission (NRC) notified VCSNS of an NRC-identified finding of very low safety significance (Green) with a cited violation. This violation states the licensee failed to ensure that the conditions adverse to fire protection were promptly corrected.

SCE&G has reviewed the description of the subject violation and will not contest the violation. Pursuant to the provisions of 10 CFR 2.201, SCE&G hereby submits a response to the alleged violation provided in Attachment I.

A Commitment is required to restore full compliance and is provided in Attachment II. If you have any questions about this submittal, please contact Mr. Bruce L. Thompson at (803) 931-5042.

Very truly yours,

George A. Lippard

WHK/GAL/sr

Attachments:
Attachment I – Reply to Notice of Violation 05000395/2017002-01
Attachment II – Commitments

cc: Without Attachment unless noted
K. B. Marsh
S. A. Byrne
J. B. Archie
N. S. Carns
J. H. Hamilton
G. J. Lindamood
W. M. Cherry
C. Haney
S. A. Williams (with Attachment)
NRC Resident Inspector
L. W. Harris
Paulette Ledbetter
K. M. Sutton
NSRC
RTS (CR-17-04335)
File (815.01)
PRSF (RC-17-0126) (with Attachment)

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) Unit 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12

ATTACHMENT I

REPLY TO NOTICE OF VIOLATION 05000395/2017002-01

NOTICE OF VIOLATION

During an NRC inspection conducted between April 1 and June 30, 2017, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

From August 6, 2013, through February 10, 2015, the Virgil C. Summer Nuclear Station, Unit No. 1, Renewed Facility Operating Licensee No. NPF-12, Condition 2.C.(18), Fire Protection System states, in part, that the licensee shall implement and maintain in effect all provisions of the approved Fire Protection Program as stated in the FSAR of which Section 9.5.1.1 states, "The fire protection systems are also addressed in the Fire Protection Evaluation Report (FPER), which is considered a part of this FSAR". Section 5, "Corrective Action," of the FPER states, "The identification of conditions adverse to quality, the cause of the condition, and the corrective action taken are documented and reported to appropriate levels of management. This is accomplished in accordance with the Operational QA Plan." The Quality Assurance Program Description, Revision 0, effective May 17, 2012, Section 2, "Non-safety-related SSCs Credited for Regulatory Events," states, SCE&G implements quality requirements for the Fire Protection System in accordance with Regulatory Position 1.7, "Quality Assurance," in Regulatory Guide 1.189, Rev. 2 "Fire Protection for Operating Nuclear Power Plants" as identified in FSAR Chapter 3, Appendix 3A."

From February 11, 2015, to the present date, the Virgil C. Summer Nuclear Station, Unit No. 1, Renewed Facility Operating Licensee No. NPF-12, Condition 2.C.(18) states, in part, that the South Carolina Electric & Gas Company (SCE&G) shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request (LAR) dated 11/15/11 (and supplements dated 1/26/12, 10/10/12, 2/1/13, 4/1/13, 10/14/13, 11/26/13, 1/9/14, 2/25/14, 5/2/14, 5/11/14, 8/14/14, 10/9/14, and 12/11/14) and as approved in the safety evaluation report dated 02/11/15.

Section 4.7.3 of the LAR states, in part, that VCSNS will implement a revised quality assurance program to ensure compliance with Section 2.7.3 of NFPA 805 and the revised fire protection quality assurance program is based on Regulatory Position 1.7, "Quality Assurance," in Regulatory Guide (RG) 1.189, Rev. 2, "Fire Protection for Operating Nuclear Power Plants."

Section 1.7.8 of RG 1.189 states, in part, that conditions adverse to fire protection, such as failures, malfunctions, deficiencies, deviations, defective components, uncontrolled combustibles materials, and non-conformances are promptly identified, reported, and corrected.

Contrary to the above, as of June 30, 2017, the licensee failed to ensure that conditions adverse to fire protection as noted in a previous NRC-identified Green NCV, 05000395/2013003-03, "Failure to Adequately Design, Install and Maintain Oil Collection Devices for Reactor Coolant Pump Motors," were corrected. Specifically, the licensee failed to implement corrective actions to restore compliance in a timely manner for (1) a failure to ensure an adequate design for the oil lift pump enclosure, and (2) a failure to have oil collection components for internally leaked oil dripping from the motor air discharge ductwork flange area. The licensee has entered this in their CAP as CR-17-03962.

This violation is associated with Green, reactor oversight process (ROP) finding as determined by the significance determination process (SDP).

1. **Reason for the violation**

   VCSNS did not place sufficient emphasis on ensuring the Reactor Coolant Pump Oil Collection System complied with the requirements of 10 CFR 50 Appendix R and subsequently NFPA 805 in a timely manner.

2. **The corrective steps that have been taken and the results achieved**

   The station has implemented a bridging strategy until the implementation of Engineering Change Request (ECR) 50909, RCP Oil Enclosure, during RF24. The following Work Orders (WO) were developed to install latches and seal enclosure openings for all three RCP enclosures:

   WO 1705616 installed latches and sealed enclosures per EIR 82381 on A RCP
   WO 1705617 installed latches and sealed enclosures per EIR 82381 on B RCP
   WO 1705618 installed latches and sealed enclosures per EIR 82381 on C RCP

   This work was completed during RF-23, which ended in June 2017. Compensatory measures to station an operator in the vicinity of a RCP during starts to check for oil leaks, will remain in effect until full compliance is achieved.

3. **The corrective steps that will be taken**

   ECR 50909, RCP Oil Enclosure, will be implemented during RF24. This ECR will ensure compliance with NFPA 805 for RCP oil collection requirements by modifying the oil lift pump enclosures, and fill and drain enclosures, and drip pans as necessary. This ECR will also address oil drips from the RCP exhaust duct to motor flange joint.

4. The date when full compliance will be achieved

Full compliance will be achieved prior to the completion of RF24.

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) Unit 1
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ATTACHMENT II

COMMITMENTS

Commitment	Due Date/Event
VCSNS will complete ECR 50909 prior to the completion of RF24.	Close of Breaker ending RF24