

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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M. C. JOHNSON

VICE PRESIDENT AND GROUP EXECUTIVE  
SPECIAL SERVICES AND PURCHASING

November 15, 1979

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United States Nuclear Regulatory Commission  
ATTN: Mr. James P. O'Reilly  
Director, Region II  
Marietta Building, 31st Floor  
101 Marietta Street, NW  
Atlanta, Georgia 30303

Subject: V. C. Summer Nuclear Station  
Unit #1  
Response to NRC Audit Report  
50-395/79-30 dated 10/24/79

Gentlemen:

In response to the above captioned report, we have reviewed the information found there-in and find it contains no proprietary information. In addition, we have evaluated the circumstances relating to the item identified as 79-30-09 in the captioned report, which dealt with an infraction relating to procedural adequacy to assure compliance with 10CFR Part 21 regulations. Resulting from an evaluation of the infraction, the following information is provided.

1. Cause

SCE&G has interpreted 10CFR21 and NUREG 0302 revision 1 to indicate that the reporting requirements of 10CFR21 can be satisfied by those of 10CFR50.55(e) and Licensee Event Reports required by Regulatory Guide 1.16. While it remains SCE&G's position that the above interpretation is correct, we agree with Region II inspectors that our procedures did not explicitly require documented consideration of the items required by 21.21(b)(3) and that a report submitted without such consideration may not satisfy 10CFR21. The cause of this procedure concern is therefore the failure to include requirements for explicit consideration of sub-items (i) through (viii) of 21.21(b)(3).

2. Immediate Corrective Steps Taken

All affected departments have completed a review of their procedures. We have also considered previously reported items and have found that they satisfy what we feel to be the intent of 21.21(b)(3).

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3. Corrective Steps to Avoid Future Noncompliance

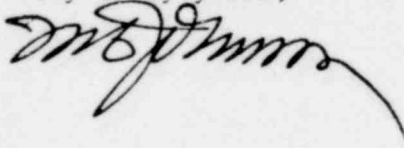
Our procedures are in the process of being modified to require documented consideration of 10CFR21.21(b)(3) for those conditions satisfying the reporting requirements of 10CFR50.55(e) (or Regulatory Guide 1.16 after we receive our operating license). It remains our opinion that all substantial safety hazards are also construction significant deficiencies and that proper procedural implementation of Regulatory Guide 1.16 will assure that all substantial safety hazards occurring after obtaining an operating license can be properly dispositioned as LER's provided that they include the information required in 21.21(b)(3). Our procedures now require the appropriate responsible officer to be informed of affirmative evaluations. We consider his signature on the report to the NRC, documentation of this occurring.

4. Full Compliance Date

All procedural modification and indoctrination will be complete by December 31, 1979.

We trust that you will find our actions to resolve this item appropriate and satisfactory. Please feel free to contact us if we can provide additional information in relation to this item or the subject report.

Very truly yours,



DAN/MCJ/jls

cc: C. J. Fritz  
G. C. Meetze

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