SOUTH CAROLINA ELECTRIC & GAS COMPANY

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E. H. CREWS, JR. VICE PRESIDENT AND GROUP EXECUTIVE ENGINEERING AND CONSTRUCTION

May 28, 1980

Mr. Robert L. Tedesco Assistant Director for Licensing Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Separation of Electrical Equipment and Systems

Dear Mr. Tedesco:

We have reviewed your letter of May 5, 1980, requesting that a detailed field audit of installed electrical equipment and systems be performed at the Summer Station in order to verify our conformance to our FSAR separation criteria. We believe the intent of the requested audit has already been performed through activities described below:

- 1. The site Quality Control inspection program has documented conformance with the FSAR separation criteria during all phases of the installation of class lE electrical equipment and systems. This program also included the inspection of associated circuits for conformance to separation criteria. Procedures for cable pulling, cable terminations, installation of electrical equipment, installation of exposed conduit supports and wiring, and installation of cable trays, supports, electrical noise and fire barriers document the scope and conduct of the inspections. Exceptions to separation criteria identified during these inspections have been documented and corrective action initiated through the site nonconformance program.
- 2. The Quality Assurance program has documented 59 individual surveillances since January, 1979, that either totally or partially address conformance to FSAR separation criteria. These surveillances are documented through the si e quality assurance procedures for surveillance of site activities. Exceptions to the separation criteria which were identified during these surveillances have been documented and corrective action taken under the site nonconformance program.
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- 3. NRC Inspection and Enforcement Branch, Region II, has performed several inspections of the Summer Station electrical cables and equipment and of electrical installation QA records to verify conformance to FSAR separation criteria. A minimum of six (6) inspection visits have been performed since October, 1978. (Ref: NRC/I&C Reports 78-30, 79-02, 79-09, 79-18, 79-32 and 80-02)
- 4. A comprehensive and documented review was recently completed for Summer Station as a part of the staff's fire protection review. This review was conducted to insure that safe shutdown equipment and redundant electrical circuits were adequately separated to effect safe plant shutdown. Problem areas that were identified during this review have been corrected. (Ref: VCS Fire Protection Evaluation Manual)

Documentation to support the foregoing is available in the public record or will be made available upon request. It is requested that the audit and inspection programs described above be accepted as sufficient demonstration that separation criteria has been achieved and verified at the Virgil C. Summer (Nuclear Station.

ery)truly yours, dews, Jr.

KWN:EHC:rh

cc: H. T. Babb E. H. Crews, Jr. H. R. Denton - NRC D. R. Moore J. P. O'Reilly - NRC H. Radin V. C. Summer M. B. Whitaker, Jr. NPCF/Dixon File