

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE BOX 764

COLUMBIA, SOUTH CAROLINA 29218

M. C. JOHNSON

VICE PRESIDENT AND GROUP EXECUTIVE  
SPECIAL SERVICES AND PURCHASING

December 17, 1979

DEC 19 4 49

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  
50-395/79-34 dated 11/20/79

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 79-34-01 in the captioned report which dealt with the failure of the Constructor to process an approved field change request in accordance with procedures.

1. Cause

Pipe support CSH-019 installed in field deviated from approved Field Change Request B-318. Specifically, that base plate for the support had to be notched in order to avoid the interferences with an adjacent pipe support. FCR B-318 allowed for a specific symmetrical cut to be made to correct the problem. The procedural violation involved two conditions. The first condition was that the base plate had been cut in a different manner from the approved document, and subsequently installed. The second was that the FCR was completed by the Constructor's Quality Control without the plate being installed per this FCR.

The Constructor's technical investigation indicates the probable cause of this deviation was that the base plate had been off-centered to install two Hilti expansion bolts. This is done at times to avoid drilling into rebar embedded in the concrete.

It is noted that FCR-B 318 was initiated July 25, 1977, and verified as complete by the Constructor QC on December 3, 1978. The conditions documented by 79-34-01 represent an additional example of failure of the Constructor's crafts and QC organization to comply with procedural requirements in the piping hanger area. This concern

8004020035

790403  
OFFICIAL

December 17, 1979

was identified by SCE&G/QA in late November 1978 and resulted in SCE&G/QA Corrective Action Request (CAR) 047 dated December 20, 1978, and CAR 50 issued March 29, 1979. This latter CAR documents the SCE&G/QA position that a systematic inadequacy in hanger documentation was evident and that overall corrective action was required.

The root cause of this inadequacy is therefore considered beyond documentation errors and related to the overall Constructor quality organization and attitude in that time period.

2. Immediate Corrective Steps Taken

On 11/6/79, a Nonconformance Notice (1098) was initiated to document both the as-built condition of CSH-019 and the procedural violations involved. The NCN was dispositioned "Accept As Is" per Engineering determination that the strength of the as-built condition did not differ significantly from the design condition.

Per NCN-1098, the Project Piping Superintendent was given the responsibility to inform all piping craft to insure that all deviations from approved design documents not covered by existing standards and tolerances are approved and properly documented prior to installation. In addition, the Project QC Manager was given the responsibility to inform all Piping and QC Inspectors to insure that pipe supports have been installed per approved designed documents including any existing Field Change Requests and Nonconformance Notices.

3. Corrective Steps to Avoid Future Noncompliance

In June of this year an extensive reorganization of the Constructors quality organization was initiated. From the SCE&G point of view, insufficient organizational independence was a major factor in quality attitude. As part of the reorganization all functional control of the quality organization was removed from the Project Manager. In addition, a QC Documentation Section reporting directly to the new Constructor Quality Manager was created and charged to resolve the concerns of CAR 50 by a review of all documentation packages. These efforts were reinforced by a Constructor directive issued by the President and Chief Operating Officer to all Project employees emphasizing quality program responsibilities.

Notwithstanding the above efforts, SCE&G considered the overall implementation of the Constructor ASME Code program, of which the hangers are a part, of such importance that additional measures under our direct control have been taken.

- I. A surrogate SCE&G/QC hanger inspection program has been established consisting of:
  - A. An in-process program in which SCE&G/QC inspectors work jointly with the Constructor QC inspectors to inspect the installation of the remaining hangers.
    1. An instruction and checklist will be developed jointly with SCE&G/QC and Constructor QC that will be used by both organizations to perform required inspections.
    2. A training program will be developed to train the inspectors of both groups to the requirements of the hanger procedures and the instruction and checklist.
    3. As the Constructor QC inspectors perform their daily inspections, the SCE&G inspectors will work with each of them periodically to ensure the competency of the individual inspectors and to ensure the quality of the overall hanger program. Our intentions are to work with specific inspectors on rotating days until confidence is gained or competency is established with each inspector. Documentation of each hanger inspected will be completed.
  - B. A backfit inspection program will be developed for the inspection of all hangers that have been completed and QC accepted. The program will consist of the following inspections:
    1. A visual inspection of completed welds
    2. An inspection check of the location and configuration of the hanger as detailed in the appropriate packet.
    3. A random check of some hilti installations
    4. Visual inspection of the snubber installation
    5. Review of the hanger packet for completeness and validity

This backfit inspection program will continue until we catch up with the in-process inspection work, or until such time as we can express confidence in the quality level of the hangers installed.

- II. CAR 47 & 50 remain outstanding until SCE&G/QA surveillance confirms success of the corrective action including the efforts in I. above.

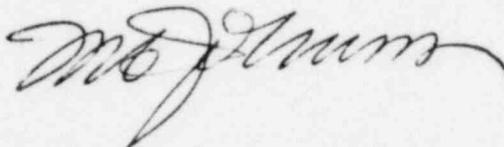
Mr. James P. O'Reilly  
Page 4  
December 17, 1979

4. Full Compliance Date

All actions here-in described have been initiated as of this date and will continue until complete.

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/vtw

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