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SOUTH CAROLINA ELECTRIC & GAS COMPANY

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VICE PRESIDENT AND GROUP EXECUTIVE  
NUCLEAR OPERATIONS

October 3, 1980

U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W.  
Atlanta, GA 30303

ATTENTION: Mr. James P. C'Reilly, Director

Subject: V.C. Summer Nuclear Station  
Unit #1  
License CPRP-94, Response to  
NRC Audit Report 50-395/80-20  
dated 9/4/80 and 50-395/80-21  
dated 9/11/80

Gentlemen:

In response to NRC reports 50-395/80-21 and 50-395/80-20, we have reviewed the information therein contained and find no proprietary information. In addition, we have evaluated the circumstances relating to the item of non-compliance No. 80-20-01 and provide the following results of that evaluation.

80-20-01 Dealt with failure to follow procedure for fit-up of butt welded pipe.

1. Cause

The time frame in which the fit-up of the butt joint identified in this item of noncompliance was made, was June-July 1979. It was at that time that the craft and constructor's ASME Code QC failed to follow procedures and accepted a fit-up that did not meet criteria. SCE&G believes that this occurrence is further manifestation of the constructor's ASME inspection program breakdown that was reported in various communications to Region II associated with items 79-35-02, 79-24-02, 80-05-06 and 79-36-04. The breakdown resulted from any of a combination of factors including some specific procedural inadequacies, and some less specific interpretation, training, competency, attitude, and supervision inadequacies.

2. Immediate Corrective Steps Taken

Upon discovery, during this NRC visit, that a potential mismatch and/or underwall condition existed for the specific weld joint in question, SCE&G took specific steps to ascertain the adequacy of the joint. The data associated with this joint was added to that taken and being analyzed for a generic concern on mismatch and fit-up presently assigned NRC unresolved Item 79-35-05. SCE&G Engineering and their agents are

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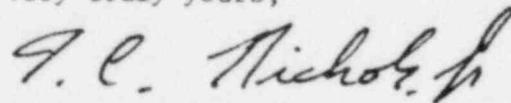
presently determining what the significance is of some mismatch and underwall conditions in Class 3 Butt Welds. The conclusions of the actions taken with respect to 79-35-05 will apply to the weld joint in question, as well as all other Class 3 Butt Welds with questionable fit-up of which SCE&G has cognizance. No specific items of action were determined appropriate with respect to the failure to follow procedure based on 3. to follow.

3. Corrective Steps to Avoid Future Noncompliance

Commensurate with many corrective actions taken in December 1979 and January 1980, with respect to the constructor's ASME code inspection program breakdown, certain actions were taken with respect to Class 3 Butt Welds. A work hold was placed on code QC work at that time while procedures were amplified and clarified, and QC organizations were reorganized, and extensive indoctrination and training took place. The work hold on Class 3 Butt Welds was released January 2, 1980 at which time it was determined Class 3 Butt Welds could be made within procedural guidelines by properly trained personnel. SCE&G believes the corrective actions implemented in December 1979 and January 1980, with respect to the many concerns in existence as a result of the constructor's QC breakdown, have eliminated the potential for recurrence of the procedure violation that occurred in June-July 1979.

We trust that you will find the SCE&G actions to resolve this item both appropriate and satisfactory. Please feel free to contact us if further clarification or information relative to this item is needed.

Very truly yours,



T. C. Nichols, Jr.

TCN:jfr

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