

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

January 13, 1981

UNITED STATES NUCLEAR REGULATORY COMMISSION
Region II
101 Marietta Street, N.W.
Atlanta, GA 30303

ATTENTION: Mr. James P. O'Reilly Director

Subject: V.C. Summer Nuclear Station
Unit #1
License CPRP-94 Docket #50-395,
Reportable Item in accordance
with 10CFR50.55(e), Unauthorized
Hanger Work

Gentlemen:

On December 16, 1980, SCE&G notified Region II (J. Rausch) of a potentially reportable item dealing with unauthorized hanger work. Specifically, SCE&G/QC personnel have found disassembled hangers that had previously been completed, inspected and had their associated documentation completed. These discrepancies were detected during performance of SCE&G/QC reinspections of hangers for installation and material acceptability as previously described to Region II in letters dated November 11, 1980 and March 21, 1980. The discrepancies detected include hanger hardware (i.e. clamps, bolts, pins) loose or removed; and one case involved the removal of welds. The discrepancies were documented on program nonconformance documents when detected, and none appeared to have been done via proper work authorization with proper QC involvement.

Cause

In assessing the specific discrepancies identified, SCE&G has concluded that the subject hangers were disassembled to facilitate some authorized work being performed which was associated with those hangers. One example is that of a hanger which was loosened and moved to permit access to a pipe weld for nondestructive examination. Even the hanger which had welds removed has been tracked to associated piping rework that caused hanger gap deficiencies, necessitating the need to adjust the hanger. (Reference SCE&G DN-5678H and NCN-1277H respectively)

The personnel involved with the detected discrepancies were apparently unaware of the programmatic controls needed to disassemble and reassemble a hanger whenever it impeded or interfered with the work they were performing as authorized by proper documentation. This condition, therefore, is attributed to human error, possible production pressure, and lack of knowledge of the program requirements.

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SCE&G has concluded that there appeared to be no overt intentions to modify hangers. To the contrary, evidence exists that some hangers that were disassembled were reassembled to the as-built and inspected conditions. In one case it was determined that a hanger packet was even being retrieved for use when the hanger was disassembled; although, the disassembly did commence prior to obtaining the hanger packet.

Safety Implications

SCE&G intends to have disassembled hangers returned to their exact design condition; therefore, no adverse safety significance will exist. Since the total extent of the discrepancies is not known at this time, (but will be determined via actions to be described below), it cannot be assumed that if gone uncorrected, a hanger would not have existed for which the disassembly and reassembly resulted in a modification that could affect the safety of a system. To establish this positively, the specific discrepancies would need to be evaluated for each hanger as they relate to the effect on the hanger and subsequently on the system. Since it is apparent that unauthorized work has been performed on hangers, adverse safety significance cannot be ruled out. Therefore, SCE&G is conservatively classifying this item as a potential significant deficiency. Discrepancies detected will be returned to design conditions, evaluated by Engineering for accept as is, or reworked as required.

Actions to Correct Conditions

For possible unauthorized hanger work done to date, a program has been implemented within SCE&G/QC to detect further work that may have been done, in addition to that already known, and which may not have been returned to the as-built and inspected status. This program consists of QC inspectors performing a monitoring operation of installed hangers in conjunction with inspections being performed as described in the letters to Region II previously mentioned herein. The monitoring operation consists of checking completed hangers in the proximity of those being inspected, to verify that they have not been disassembled or possesses discrepancies noted due to unauthorized work. The results of the monitoring will be recorded in a report which will be written, and evaluated daily by SCE&G/QC supervisor to determine extent of problems and need for increased/decreased QC activity. Any discrepancies noted will be documented by nonconformance documents and will receive an Engineering evaluation or will be returned to design conditions as appropriate. Decisions regarding further inspection of hangers will be made based on the monitoring program as necessary, but SCE&G does not anticipate an extensive problem based on the facts to date.

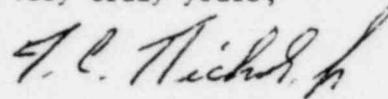
Corrective Actions to Prevent Recurrence

An extensive reindoctrination program with personnel in each craft (i.e. carpenters, millwrights, painters, pipefitters, etc.) has been implemented to emphasize the necessity of proper authorization, documentation, and QC interface prior to disassembly of hangers. SCE&G believes that this indoctrination should eliminate further discrepancies of this nature and was given to all crafts since most of the original hanger indoctrination was not given to crafts performing peripheral work.

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SCE&G believes that the actions outlined above will enable the prevention of discrepancies noted herein as well as the detection of any further problems that now exist. We also believe we now have programmatic control of this item and the means to assure that hangers will be correct. For these reasons, SCE&G considers this a final report on this subject. We will update the status of this item in a future letter if the actions or investigations described above reveal a change in existing facts. Information relative to this item will be available at the plant site for your further review as desired. Should any questions arise or further information be required, please call.

Very truly yours,



T. C. Nichols, Jr.

DRM:TCN:jfr

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