

MANAG REGION 11
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SOUTH CAROLINA ELECTRIC & GAS COMPANY

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T. C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

May 13, 1981

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street, N.W.
Atlanta, Georgia 30303

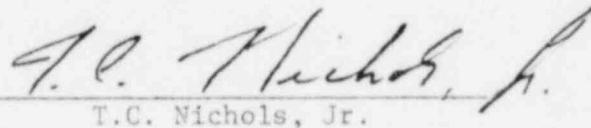
Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
RII: JLS-50-395/81-05

Dear Mr. O'Reilly:

Attached is South Carolina Electric and Gas Company's response to the referenced report which summarizes Mr. J.L. Skold's inspection of February 12, 1981 through March 31, 1981. Specifically, we have addressed the violations concerning verification of hydrostatic test boundaries and subsequent approval of unacceptable test results.

Should you have questions or comments, please contact us at your convenience.

I declare the statements and matters set forth herein are true and correct to the best of my knowledge, information and belief.



T.C. Nichols, Jr.

JWP:TCN:bsg
ATTACHMENT

cc: V.C. Summer J.L. Skolds
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SOUTH CAROLINA ELECTRIC & GAS CO.
VIRGIL C. SUMMER NUCLEAR STATION, UNIT #1

DOCKET NO: 50-395
REPORT NO: RII:JLS 81-05
NOTICE OF VIOLATION
EVENT DATE: JANUARY 27, 1981

DESCRIPTION OF EVENT

10 CFR 50 Appendix B, Criterion V, as implemented by FSAR Section 17.1.5 of the FSAR requires that activities affecting quality be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Quality Control Procedure VII-13, "Quality Verification of Hydrostatic and Pneumatic Tests", Section 4.6.6 requires that all valves within the test boundary be properly aligned so that all components will be subjected to test pressure.

Contrary to the above, on January 27, 1981, Hydrostatic Test CS-21-H1, Holdup Tank, was performed and subsequently approved with valve 8620 shut, preventing the piping between valve 8620 and 8621 (Hydrostatic Test Boundary) from being subjected to test pressure.

ADMISSION OR DENIAL OF ALLEGED VIOLATIONS

South Carolina Electric and Gas Company recognizes this item as a violation of the aforementioned regulatory requirements.

REASONS FOR VIOLATION

The section of pipe between valves 8620 and 8621 was omitted from subjection to the hydrostatic test pressure of test CS-21-H1 due to an over-sight by a quality control (QC) inspector and a procedure deficiency.

The QC inspector failed to accurately "Verify that all valves within the test boundary are properly aligned so that all components will be subject to the test pressure" as specified in procedure QCP VII-13, "Inspection of Hydrostatic and Pneumatic Testing". The physical configuration of the subject valves contributed significantly to the cause of this over-sight. The valves, numbers 8620 and 8621 are in series and not more than two (2) inches apart with the check valve 8621 being the test boundary valve. The inspector, being accustomed to verifying that boundary valves are in the "closed" position, inadvertently verified that the incorrect valve, diaphragm valve 8620, was "closed".

During pretest updating of procedure CS-21-H1, "CVCS Hold-Up Tank Header Hydro", the required test position of diaphragm valve 8620 was changed from "open" to "closed" in error. This error was not detected during review of test results.

CORRECTIVE STEPS TAKEN

Prior to performance of test CS-21-H1, the omitted section had been hydro-tested to the pressure called for in CS-21-H1 under the auspices of non-code hydro CS-25-H1. This action verified the integrity of the omitted section and the error, had it gone undetected, would not have adversely effected the safety of

CORRECTIVE STEPS TAKEN (cont'd.)

operations of the V.C. Summer Nuclear Station. However, further verification of system integrity has been achieved through re-test of the system in accordance with code hydro test CS-21-H1.

CORRECTIVE STEPS TAKEN TO PRECLUDE RECURRENCE

A one-hundred percent (100%) review program of safety-related piping hydrostatic test results has been implemented per administrative directive contained in letter SER-543-SU. This program will assure that no other errors in procedure preparation and/or conduct of hydrostatic tests go undetected in the startup program.

The possible safety implications of this type incident has been discussed with Quality Inspectors. The inspectors were also requested to place special emphasis on the position of all boundary valves in checking pressurization of hydro tests.

DATE OF FULL COMPLIANCE

The actions stated above shall be effected by June 1, 1981.