

APPENDIX A

NOTICE OF VIOLATION

South Carolina Electric & Gas
V. C. Summer

Docket No. 50-395
License No. NPF-12

As a result of the inspection conducted on May 16 - June 10, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 6.2.2 states that during any absence of the control room foreman from the control room while the unit is in Mode 1, 2, 3 or 4, an individual (other than the shift technical advisor) with a valid Senior Reactor Operator (SRO) license shall be designated to assume control room command function.

Contrary to the above, on May 24, 1983, with the plant in Mode 1, the control room foreman left the control room without another individual in the control room with a valid SRO license having been designated to assume the command functions.

This is a Severity Level IV Violation (Supplement I).

- B. Technical Specification 6.8.1 requires that written procedures be implemented and maintained covering the applicable procedures recommended in Appendix A to Regulatory Guide 1.33, Revision 2. Plant Document Procedure (PDP)-101, Document Control Procedure, paragraph 3.2 states that only approved documents of the latest revision be utilized. Section V of System Operating Procedure (SOP)-409, Digital Metal Impact Monitoring System, requires action be taken when the digital metal impact monitoring system alarms.

Contrary to the above, procedures were not implemented in that:

1. On May 31, 1983 the following procedures were being utilized but were not of the latest revision:

Copy #7

SOP-118	Component Cooling System
SOP-310	120 VAC Instrument and Control System

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SOP-101	Reactor Coolant System
SOP-105	Boron Recycle System
SOP-112	Safety Injection System

SOP-114	Reactor Building Ventilation System
SOP-115	Residual Heat Removal
SOP-116	Reactor Building Spray System
SOP-117	Service Water System

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SOP-124	Process and Area Radiation Monitoring System
SOP-210	Feedwater System
SOP-212	Steam Generator Blowdown

These examples are not intended to be all inclusive but represent a sample of deficient procedures found.

2. On May 23, 1983 no action had been taken by the operators to an alarm condition on the digital metal impact monitoring system even though the alarm had existed for some time.

This is a Severity Level IV Violation (Supplement I).

- C. Technical Specification 6.8.1 requires procedures be established covering the activities referenced in the fire protection plan and those activities referenced in Appendix A to Regulatory Guide 1.33, Revision 2. Appendix A to Regulatory Guide 1.33 references procedures for alarm conditions, maintenance and testing. Preventive Test Procedure 114.002, Fire Extinguisher Checks, implements the fire protection program.

Contrary to the above, procedures were not adequate in that:

1. PTP-114.002 did not cover all fire extinguishers being used within the plant such that on May 6, 1983 three fire extinguishers were being used as part of a burn permit requirement and the fire extinguishers were either not inspected, not fully charged, or not inspected within the time requirements of PTP-114.002.
2. The annunciator response procedure for annunciator point 1-5 on panels XCP-0608(A) and XCP-0609(B) listed the probable cause, automatic actions, immediate actions and supplemental actions for the hydrogen recombiners when the procedure should have been addressing the post accident hydrogen analyzers.
3. Maintenance and testing of the reactor trip breakers was conducted on May 3, 1983, without specific procedures for the repetitive testing of the breakers and the taking of clearance measurements on the breakers.

This is a Severity Level IV Violation (Supplement I).

- D. Technical Specification 3.0.1 states that upon failure to meet a Limiting Condition for Operation, the associated action statement shall be met.

Technical Specification 3.3.1 (Table 3.3-1, Item 14, Action Item 6) addresses the steam/feedwater mismatch and low steam generator water level trip. The action statement requires that an inoperable channel be placed in the tripped condition within one hour if the number of operable channels is one less than the total number of channels.

Technical Specification 3.7.9.2.(g) addresses the operability of the sprinkler/system in the intermediate building. The action statement requires a continuous fire watch be established within one hour if the sprinkler system in the intermediate building becomes inoperable.

Technical Specification 3.7.1.2 addresses the operability of the emergency feedwater system. The action statement states that with one emergency feedwater pump inoperable, restore the required emergency feedwater pump to operable status within 72 hours or be in hot standby within the next six hours and in hot shutdown within the following six hours.

Contrary to the above:

1. Between May 20 and 23, 1983 FT-486, steam generator B feedwater flow transmitter, was inoperable, rendering inoperable one channel of the steam/feedwater flow mismatch circuitry. The channel was not placed in the tripped condition within one hour on May 20, 22, and 23, 1983.
2. On May 19, 1983 a continuous fire watch was not established in the intermediate building within one hour after the sprinkler system for the intermediate building became inoperable.
3. On May 25, 1983 the turbine driven emergency feedwater pump speed controller was left in the "slow" position following a surveillance test, rendering the pump inoperable and the controller remained in this position until May 31, 1983. The plant did go to hot standby, due to a reactor trip, in the following 78 hours but did not go to hot shutdown in the following 6 hours.

This is a Severity Level IV Violation (Supplement I).

- E. Technical Specification 3.0.4 states that entry into an operational mode shall not be made unless the conditions of the limiting condition for operation is met without reliance on provisions contained in the action requirements. Specification 3.5.4.2 requires at least two independent channels of heat tracing be operable in Modes 1, 2 and 3.

Contrary to the above, on May 18, 1983 the plant entered Mode 3 with train B of the heat tracing deenergized thus violating Specification 3.0.4. This heat tracing remained deenergized until May 20, 1983.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged viola-

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tions; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: JUL 25 1983