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Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 90-06

Gentlemen:

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the violation addressed in Enclosure 1 of NRC Inspection Report 50-395/90-06. SCE&G is in agreement with the alleged violation, and the enclosed response addresses the reason for the violation and the corrective actions being taken to prevent recurrence.

If you should have any questions, please advise.

Very truly yours,

O. S. Bradham

HID/OSB:1bs
Attachment

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RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/90-06-01

I. ADMISSION OR DENIAL OF THE VIOLATION

South Carolina Electric & Gas Company (SCE&G) is in agreement with the alleged violation.

II. REASON FOR THE VIOLATION

- A. The reason for the violation relative to the work on the reactor coolant filter was due to the failure to follow procedures, poor supervisory pre-job briefing, and failure of both job supervisor and the workers to adequately review the Maintenance Work Request (MWR). In addition, these personnel failed to detect the absence of the Shift Supervisor's approval prior to starting work and failed to verify that the system was in a proper alignment prior to initiating work activities. Health Physics personnel did not comply with HPP-151, "Use of the Radiation Work Permit (RWP) and Standing Radiation Work Permit (SRWP)," and Special Instruction 02-02 for remote filter changeouts.
- B. The Licensee performed an extensive investigation to determine how the valve became mispositioned. The results of this investigation were inconclusive. However, it appears that the valve was not properly aligned subsequent to a Surveillance Test performed on February 20, 1990.

III. CORRECTIVE STEPS TAKEN AND RESULTS

- A. The filter was immediately isolated and changeout of the filter was later completed. Maintenance discipline supervisors, line supervisors and crew members were indoctrinated on the importance of supervisor pre-job briefings, the need for attention to detail regarding work requests, and the requirement to verify that the equipment/systems are properly aligned prior to initiating work activities. Disciplinary action was taken to formally counsel four mechanics and one supervisor.

A Management Review Board meeting was held to discuss the event. Actions resulting from this meeting included the issuance of a memorandum by the General Manager, Nuclear Plant Operations, to all first line supervisors concerning the importance of obtaining clearance from the Control Room prior to initiating work activities.
- B. The instrument air root supply valve was immediately returned to the required position.

IV. CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

- A. Station Administrative Procedure SAP-300 will be revised to provide a detailed description of the workers' responsibility to verify that equipment/systems are properly aligned prior to initiating work activities. In addition, SAP-201 has been revised to better describe the workers responsibility regarding tag outs. Mechanical Maintenance Procedure MMP-225.003 was revised to accurately reflect specific steps for change out of the filter(s) and to better address appropriate precautions and limitations. Health Physics Procedure HPP-151 has been revised to clarify the responsibility and the time frame for generating Radiation Work Permits (RWP). HPP-401 has also been revised to require referencing of any Special Instructions or "Job Recipes" in an RWP.

Maintenance supervisors have been instructed to ensure control room concurrence has been obtained prior to initiating work activities, to verify themselves that the equipment/systems are properly aligned prior to initiating work, and to conduct adequate pre-job briefings prior to allow work to be initiated.

In addition to the above corrective actions, a Personnel Error Reduction/Procedure Compliance Improvement Program was initiated by the General Manager, Nuclear Plant Operations in March 1990 to reduce personnel errors and procedural noncompliances. This three step plan requires each General Manager to perform the following:

1. Establish procedural compliance expectations/requirements;
 2. Determine whether the requirements are being met, and actions taken when they are not; and
 3. Establish performance improvement groups to specifically identify problems and methods for determining improvements and monitoring performance/procedural compliance on an ongoing basis.
- B. The operations Shift Supervisors reviewed with their shift personnel the correct method of operation for small air isolation valves and the importance of independent verification requirements.

V. DATE OF FULL COMPLIANCE

- A. SAP-300, Conduct of Maintenance, will be revised by July 31, 1990.
- B. All corrective action relative to the instrument air supply valve has been taken.