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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 90-15

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

DCH/OSB:ly
Attachment

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RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/90-15-01

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

An investigation showed that the undervoltage Agastat relay had been replaced on April 27, 1990, under an equipment qualification program. Upon inspection, it was discovered that the undervoltage circuit Agastat relay should have been installed in the "normally open" configuration, but was incorrectly installed in the "normally closed" configuration. The electrical maintenance personnel that replaced the relay made an error recording the "as found" positions of the relay terminations. This led to the new relay being installed incorrectly even though an independent verification and a Quality Control inspection was performed on the "as found" and "as left" terminations. The procedural guidance governing the maintenance is clear and should have prevented the error from occurring.

III. CORRECTIVE STEPS TAKEN AND RESULTS

The relay was rewired and verified against the design drawing. Subsequent safeguard actuation testing proved proper installation and actuation of the relay.

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

The personnel involved were counseled on proper verification methods.

Electrical Maintenance Procedure (EMP-300.012), "Agastat Relay Replacement," will be changed to enhance the "as found" data collection and will require verification of the "as left" data by comparison to the design drawings.

A retest procedure is being considered that, if practical, will test the Agastat Relay without processing an ESF actuation signal.

V. DATE OF FULL COMPLIANCE

EMP-300.012, "Agastat Relay Replacement," will be revised by September 30, 1990.