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Vice President
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May 28, 1993
Refer to: RC-93-0146

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Mr. S. D. Ebnetter
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Atlanta, GA 30323

Dear Mr. Ebnetter:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
CONCERNS INVOLVING THE COMPONENT COOLING
WATER SURGE TANK OVERFLOW EVENT
NRC INSPECTION REPORT NO. 50-395/93-14

This letter is in response to concerns addressed in an NRC inspection of the events associated with the Component Cooling Water (CCW) Surge Tank overflow which occurred at VCSNS on April 7, 1993.

CONCERN:

Inadequate communications between Control Room personnel and the I&C technicians adversely effected coordination of activities associated with this event.

RESPONSE:

As mentioned in the inspection report, expectations for proper communications between technicians and the control room were reemphasized to all applicable personnel. The event was discussed with the remainder of Operations and I&C personnel in shift turnover meetings and shop meetings reemphasizing VCSNS management expectations for proper communications. In addition, Operations personnel reviewed Operations Management Standard (OS)-001 during on-shift training.

OS-001 delineates VCSNS management expectations for communications during plant activities and provides guidelines for both parties engaged in verbal communication. These guidelines include verbatim repeat-backs of equipment identification or other numerical information, writing down complicated or lengthy instructions (not to rely on memory), and the use of noun name and number to confirm proper understanding.

CONCERN:

The remaining deficient switch knobs, similar to the switch knob that broke for valve PVG-9627A during the event on April 7, 1993, may present unnecessary challenges or distractions to operators in the future, and represents a condition adverse to quality.

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RESPONSE:

Nonconformance Notice (NCN) 1972 provided a thorough evaluation of the criticality of a fast response for equipment controlled by a CMC selector switch, and the consequences should a switch knob break. The evaluation identified six switches which might require such fast action that manual operation of their valves would not suffice (XVG-8809A&B, XVG-8811A&B, and XVG-8812A&B). These valves would be required to align the Residual Heat Removal (RHR) pumps to the RHR recirculation sump in the event that the Refueling Water Storage Tank inventory is depleted. The knobs on the CMC switches of these valves were replaced between April 1990 and September 1991. All other equipment controlled by CMC switches at VCSNS does not require such fast action that manual operation would not suffice.

Based on the above, and since Operations is prepared with alternative methods for knob failures, no substantial safety hazard should exist due to failures of CMC selector switch knobs. Therefore, although the 30 to 60 seconds required to install a temporary switch knob may pose a minor distraction for operators, VCSNS is assured of safe operation of the plant until the remaining switch knobs are replaced.

VCSNS has replaced 452 of the 542 deficient switch knobs. There remains 90 switch knobs to be replaced throughout the plant. Of these, 55 are on the main control board. Replacement of these switch knobs with Valox 420 SEO knobs requires approximately 5 manhours per switch which includes de-terminating and re-terminating wiring connected to the switches. Stroking of the effected equipment is required to verify post maintenance operability. Therefore, this work is performed as the associated equipment is taken out of service or otherwise becomes available. Since most of this equipment is only available during outages, the remaining knobs will be replaced by the end of the eighth refueling which is scheduled to begin in the Fall of 1994.

In addition to the above, plant personnel designated to perform an incident investigation are currently developing a report of the incident. This operating experience information will be placed in required reading for Operations and I&C personnel to emphasize the need for self-checking and communication skills during the performance of tasks. The incident report will also determine if procedural enhancements are appropriate and other possible long term corrective actions.

Should you have any questions on the above response to concerns identified during this inspection, please contact Mr. Robert K. Marsh at (803) 345-4796.

Very truly yours,

Gary J. Taylor for
John L. Skolds
J. L. Skolds

RKM:smd

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IE 931400
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