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John L. Skolds
Vice President
Nuclear Operations

March 25, 1994
Refer to: RC-94-0090

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 94-05

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Level IV violation delineated in NRC Inspection Report No. 50-395/94-05. SCE&G is in agreement with the violation.

If there are any questions, please contact Mr. R. M. Fowlkes at (803) 345-4210.

Very truly yours,

John L. Skolds

LJM/JLS/nkk
Attachment

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RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/94-05-02

I. RESTATEMENT OF NRC VIOLATION

10 CFR 50.54(q) requires that nuclear power licensees follow and maintain in effect Emergency Plans which meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50. Technical Specification 6.8.1.e requires, in part, that written procedures shall be established, implemented and maintained covering the Emergency Plan.

Section 8.1.1 of the Emergency Plan states that "Station personnel will be informed of changes in emergency plans and emergency plan procedures at scheduled training sessions. Persons with specific duties during an emergency will receive additional training appropriate to their respective assignments." Emergency Plan Procedure - 102 describes position specific training.

Contrary to the above, the licensee failed to train one individual with responsibility for Protective Action Recommendations (PARS), assigned to the emergency response organization as an Offsite Emergency Coordinator (OEC). Training regarding revised protective action recommendations was conducted during December 1993 for program implementation by January 1, 1994.

II. STATEMENT OF POSITION

South Carolina Electric and Gas Company (SCE&G) is in agreement with the violation as stated above.

III. REASON FOR THE VIOLATION

Adequate administrative controls were not in place to insure that the appropriate personnel received the required training on revised Protective Action Recommendations (PARs) before implementation. The individual failed to attend any scheduled classes or make other arrangements to obtain the required training. The licensee's system for tracking Emergency Response Organization (ERO) training and determining individual qualification was not updated to include the special (non-routine) training requirements for EPA-400 changes to the PARs. This resulted in a failure to identify the deficiency.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The individual completed the required training satisfactorily on February 8, 1994 and was returned to a "qualified for duty" status with respect to the ERO. The qualification status of all ERO personnel has been reviewed and verified to be current.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The procedure which tracks the qualification status of the ERO will be revised to include tracking of special (non-routine) training such as that required for the EPA-400 changes to the PARs. The procedure will also be revised to include provisions to conduct a review of the training status of all ERO personnel following required training sessions to verify the current status of the ERO qualifications prior to the established end date for the training. Individuals not having completed the training within the required time frame will be removed from "active duty" status. Management has re-emphasized to all employees the importance of attending Emergency Plan training when scheduled, or arranging to receive required training prior to the applicable end date when conflicts arise.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is in full compliance with respect to the corrective steps outlined in Section IV. Corrective actions outlined in Section V will be completed by May 1, 1994.