



A SCANA Company

South Carolina Electric & Gas Company  
P.O. Box 88  
Jenkinsville, SC 29065  
(803) 345-4001

John L. Skolds  
Senior Vice President  
Nuclear Operations

May 31, 1994  
Refer to: RC-94-0149

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 94-09

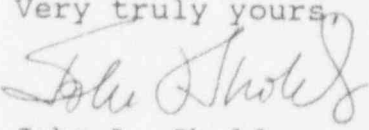
Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Notice of Violation delineated in NRC Inspection Report No. 50-395/94-09. SCE&G is in agreement with the violation, and the enclosed response addresses the reason and corrective actions being taken to prevent recurrence.

The State of South Carolina is an agreement state in accordance with both its agreement and Title 10 CFR Part 150. As such, the regulation of radioactive waste within its boundaries is the jurisdiction of the State of South Carolina under the regulatory authority of the Department of Health and Environmental Control (SCDHEC) regulation 61-63 which summarily incorporates all guidance specified in 10 CFR Part 61.

It is the position of SCE&G that the subject violation as addressed in the attached formal response is a duplication of the violation received for this incident as stated in the enforcement notice from Mr. Virgil R. Autry (SCDHEC) to Mr. Gary J. Guy (SCE&G) dated March 10, 1994.

In summary, although SCE&G is not denying the violation, SCE&G considers the proposed notice of violation by the NRC to be redundant to that issued by SCDHEC.

Should you have any questions, please call at your convenience.

Very truly yours,  
  
John L. Skolds

SBR  
Attachment

c: see page 2

070608



9406070280 940531  
PDR ADDCK 05000395  
PDR

TEO1  
11

Document Control Desk  
LE 940902  
Page 2 of 2

c: O. W. Dixon (w/o attachment)  
R. R. Mahan (w/o attachment)  
R. J. White  
S. D. Ebnetter  
S. F. Fipps  
NRC Resident Inspector  
J. B. Knotts  
J. W. Flitter  
NSRC  
Central File System  
RTS (IE 940902)  
File (815.01)

RESPONSE TO NOTICE OF VIOLATION  
NUMBER 50-395/94-09-02

I. RESTATEMENT OF NRC VIOLATION

10 CFR 61.56(a)(3) requires the licensee to meet minimum requirements for all classes of waste and is intended to facilitate handling at the disposal site and provide protection of health and safety of personnel at the disposal site. Specifically, solid waste received by the burial site for disposal, containing liquids, shall contain as little free standing and noncorrosive liquid as is reasonably achievable. In no case shall these liquids exceed one percent (1.0%) of the total volume.

Contrary to the above, on February 22, 1994, a shipment was made to the burial site which contained approximately 90 gallons of free standing liquids. This was in excess of the allowable limits of 13.46 gallons (1.0%) for a shipment this size.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

Radwaste personnel performed the Process Control Program (PCP) on two liners after they had been "gross" dewatered and stored outside the building but within the Radiation Control Area (RCA) fence. The liners were then returned inside the building to perform the PCP. Both of the liners were dewatered in accordance with the PCP with normal/expected vacuum indications observed. An eight hundred pound (800 lb.) difference in weight was noted by the technicians prior to shipment. Calculations were performed to determine the expected weight increase based on a nominal 100 ppm Total Suspended Solids in the Feed System. Radwaste personnel assumed the weight difference to be reasonable based on these calculated values. The final collection cycle for both liners yielded approximately 1000 cc of free standing liquid.

The apparent cause of the free standing liquid was determined to be a failure of the lateral suction pipe of the carbon steel liner. A hairline crack in the suction pipe would account for the vacuum indications noted by Radwaste personnel during the performance of the PCP. The cause of the crack cannot be determined.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

When notified by Chem Nuclear Regulatory personnel that one liner had been "punched" and found to contain an excess of free liquid, SCE&G contacted the Division of Radioactive Waste Management, South Carolina Department of Health and Environmental Control (SCDHEC) to discuss the situation. The Virgil C. Summer Nuclear Station (VCSNS) requested that SCDHEC punch the other liner to ensure that VCSNS did not have a programmatic or procedural deficiency. Two days later, VCSNS received verification that the second liner had been punched and that the liner met the free standing liquid requirement.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

Radwaste personnel have developed a weight chart to be incorporated into HPP-703, "Shipping Radioactive Waste" that illustrates the expected range of weights for different types of media. Even though the weight chart may not be exact, it should alert Radwaste personnel to investigate a weight differential that is greater than expected.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance with respect to the corrective actions described in Section V by June 15, 1994.