



South Carolina Electric & Gas Company  
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John L. Skolds  
Vice President  
Nuclear Operations

January 22, 1992

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  
SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT 91-21

Attached is a supplement to the South Carolina Electric and Gas Company (SCE&G) response dated January 7, 1992. This supplement was requested by the NRC following a telephone conversation on January 16, 1992. If you should have any questions, please call at your convenience.

Very truly yours,

*M D Quinter*  
John L. Skolds *for*

ARR:JLS:js  
Attachment

c: O. W. Dixon Jr.  
R. R. Mahan  
R. J. White  
S. D. Ebnetter  
G. F. Wunder  
General Managers  
C. A. Price  
NRC Resident Inspector  
J. B. Knotts Jr.  
J. W. Flitter  
NSRC  
RTS (IE 912101 and 912102)  
File (815.01)

270100

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

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PDR ADDCK 05000395  
Q PDR

IE01  
11

Violation Number 50-395/91-21-01

ITEM 2 - REMOVAL OF INSULATION

The inspection report provided 12 examples where insulation covering the contact surface between the supports and pipe was not removed during Inservice Inspection (ISI). SCE&G would like to provide clarification for these examples. Supports SWH-168 and SWH-1145 had insulation removed for the inspection (see enclosed data sheets); however, at the time the inspector performed his inspection, the insulation had been replaced. Supports SWH-163 and SWH-167 were scheduled for insulation removal; however, the supports were inadvertently inspected with insulation on part of the support. These supports have been rescheduled for inspection at the next refueling outage (RF7). For the remaining supports, SWH-154, 157, 159, 161, 169, 208, 209, and 210, SCE&G utilized the provisions of ASME Section XI, Paragraph IWF-1300e for inspection with insulation on part of the pipe support.

As mentioned in the telecon, SCE&G submitted an inquiry to the ASME Committee (dated January 16, 1992) requesting an interpretation to IWF-1300(e) to clarify the code requirement for removal of insulation on non-integral supports. The inquiry will be heard by the Committee the week of February 10. SCE&G will notify the NRC of the result of this inquiry. If SCE&G's interpretation is not supported by ASME, the current inspection procedures and plans will be revised and inspections of affected supports, with insulation removed, will be initiated.

Violation Number 50-395/91-21-02

The original response to the violation did not address SCE&G's current procedure for installation and maintenance of snubbers. SCE&G utilizes MMP-305.003, "Mechanical Snubber Maintenance - Removal/Reinstallation/Replacement," for new installation and maintenance of snubbers. Step 7.4.3 of this procedure does require verification of the clearance between spacers and spherical bearings. This procedure was provided to the NRC for consideration with respect to the violation.

Enclosure to Document Control Desk Letter  
Violation Number 50-395/91-21-01 Item 2

SAB-501  
ATTACHMENT 7

KWR P. 98 of \_\_\_\_\_

ADDITIONAL SHEET FOR SECTION 11

2D WORK REQUEST NO. 910 1702191111

HANGER NO. SWH-168 LOCATION BLDG. 3B ELEVATION 4th TRAIN 5  
ROOM NO. 1314

A. RWP NO. \_\_\_\_\_ Confined Space Entry Permit No. N/A

Scaffold Required  Yes  No Ladder Required  Yes  No  
Insulation Removal Required  Yes  No

Jim Hill 9/19/90  
Planner/Date

\* Shift Supervisor authorization to: (check required task)

- |                                     |                                     |                         |
|-------------------------------------|-------------------------------------|-------------------------|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Erect Scaffold          |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Remove Insulation       |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Perform ISE Examination |

R & R No. (if applicable) NA TIME LCO TIME (H:MI)

John Miller 9-19-90  
Shift Supervisor/Date

C. Scaffold Erected, Insulation Removed and/or ladder ready (if applicable) for ISE Examination.

John Miller 9-19-90  
Job Supervisor/Date

D. As Applicable, Performed VT ISE Examination

Performed VT-3 Examination NCM \_\_\_\_\_, Pad \_\_\_\_\_, OWO \_\_\_\_\_, KWR \_\_\_\_\_  
 Accept  Reject Q. C. Report No. VC5U-4499 4499

Performed VT-4 Examination  
 Accept  Reject NCM \_\_\_\_\_, Pad \_\_\_\_\_, OWO \_\_\_\_\_, KWR \_\_\_\_\_

Q. C. Report No. NA St. Gumberson 9/19/90  
Q.C. Operator/Date

E. Insulation Installed, Scaffold Removed, ladder removed and/or P&R cleared (if applicable)

John Miller 9-19-90  
Job Supervisor/Date

F. REMARKS

154

HWR Page \_\_\_\_\_ of \_\_\_\_\_

ADDITIONAL SHEET FOR SECTION  11  JO WORK REQUEST NO. 91011010191111

Permit No. SWH-1145 LOCATION BLDG. IB ELEVATION 419 TRAIN A  
ROOM NO. 13-12

A. HWR NO. \_\_\_\_\_ Confined Space Entry Permit No. N/A

Scaffold Required  Yes  No Ladder Required  Yes  No  
Insulation Removal Required  Yes  No

Tom Hill 1/28/91  
Planner/Date

B. Shift Supervisor authorization to: (check required task)

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| Y                                   | N                                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
- Erect Scaffold
  - Remove Insulation
  - Perform ISE Examination

R & R No. (if applicable) N/A LCO \_\_\_\_\_  
TIME \_\_\_\_\_ TIME (1700) \_\_\_\_\_

Tom Hill 1/28/91  
Shift Supervisor/Date

C. Scaffold Erected, Insulation Removal and/or Ladder ready (if applicable) for ISE Examination.

Tom Hill 1-28-91  
Job Supervisor/Date

D. As Applicable, Performed VT ISE Examination  
Performed VT-3 Examination RCM NA, Pad NA, OWO NA, HWR NA

Accept  Reject Q. C. Report No. VCSU-4757

Performed VT-4 Examination  
 Accept  Reject RCM NA, Pad NA, OWO NA, HWR NA

Q. C. Report No. NA Jack C. Hulbert 1-29-91  
Q.C. Operator/Date

E. Insulation Installed, Scaffold Removed, Ladder removed and/or R&R cleared (if applicable)

Tom Hill 1-31-91  
Job Supervisor/Date

F. Remarks

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