

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30303

Report No.: 50-395/84-08

Licensee: South Carolina Electric and Gas Company

Columbia, SC 29218

Docket No.: 50-395

License No.: NPF-12

Facility Name: Summer

Inspection at Summer site near Jenkinsville, South Carolina

Inspector: Koss C. Butcher for

Approved by: Hantuth .

Floyd S. Cantrell, Section Chief

Division of Reactor Projects

SUMMARY

Inspection on March 1-31, 1984

Areas Inspected

This routine, unannounced inspection involved 160 inspector-hours on site in the areas of licensee action on previous enforcement matters, plant tour, plant operations review, Technical Specification compliance, physical protection, maintenance and surveillance review, fire protection program implementation review, nonroutine event report, bulletin responses and licensee action on previous inspection findings.

Results

Of the ten areas inspected, no violations or deviations were identified in nine areas; one apparent violation was found in one area (failure to implement fire protection procedures, paragraph 11).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*O. Bradham, Director, Nuclear Plant Operations

*J. Connelly, Deputy Director, Nuclear Plant Operations

*K. Woodward, Manager, Operations

*M. Browne, Manager, Technical Support

*B. Croley, Group Manager, Technical and Support Services

*W. Bacon, Associate Manager, Chemistry

D. Lavigne, Associate Manager, Quality Assurance G. Moffatt, Associate Manager, Project Engineering *A. Koon, Associate Manager, Regulatory Compliance

*D. Gentry, Security Maintenance Supervisor

*J. Derrick, Associate Manager, Maintenance Engineering

*B. Amick, Quality Control Supervisor B. Williams, Supervisor of Operations

H. Donnely, Nuclear Licensing *R. Campbell, ISEG Engineering

*H. Fields, Regulatory Interface Engineer

*C. McKinney, Regulatory Compliance *R. Booknight, Regulatory Compliance

*W. Safley, Fire Protection Coordinator

Other licensee employees contacted included engineers, technicians, operators, mechanics, security force members, and office personnel.

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on April 4, 1984, with those persons indicated in paragraph 1 above. The violation and inspector followup item were discussed with those personnel present at the exit interview.

3. Licensee Action on Previous Enforcement Matters

(Closed) UNR 83-01-01, Hydrogen Monitor Flow Discrepancy. The inspector reviewed licensee documentation which indicated that the monitor flow at the time the URI was written resulted from a stuck open flow regulator. The flow rates identified in the STP have been changed to coincide with the manufacturer's technical manual.

(Closed) VIO 83-34-01, Alarm Response Procedures for Annuciators at the Diesel Generator (DG) Local Panels. The inspector reviewed the DG local panel alarm response procedures issued January 13, 1984. The inspector had no further questions.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Plant Tour

The inspector conducted plant tours periodically during the inspection interval to make an independent assessment of equipment conditions, plant conditions, radiological controls, safety and adherence to regulatory requirements. The inspector also verified that monitoring equipment was operating properly, equipment was properly tagged, operations personnel were aware of plant conditions and plant housekeeping efforts were adequate. During tours, the inspector looked for the existence of unusual fluid leaks, piping vibrations, pipe hanger and seismic restraint settings, various valve and breaker positions, adequacy of firefighting equipment and instrument calibration dates. Some tours were conducted on backshifts. The results of these tours were satisfactory except as identified in paragraph 11 of this report.

6. Plant Operations Review

The inspector periodically reviewed shift logs and operations records including surveillance test procedure data sheets, instrument traces and records of equipment malfunctions. The review also included the control room logs, tagout log and the removal and restoration log. The inspector routinely observed operator alertness during plant tours. Shift turnovers were observed to verify that they were conducted in accordance with approved procedures.

During this inspection period, the unit was operated at or near capacity load until March 23, 1984. On March 23, 1984, the unit was brought to hot shutdown condition to begin a preplanned spring maintenance outage. Major outage activities include removal of steam generator snubbers for seal modification, repair of reactor coolant pump "C" seals and the 18-month inspection of the "B" diesel generator. The outage is scheduled to terminate and the unit returned to power on April 18, 1984.

No violations or deviations were identified.

7. Technical Specification Compliance

During the reporting interval, the inspector verified compliance with selected Limiting Conditions of Operation (LCO) and results of selected surveillance tests. The verifications were accomplished by direct observation of monitoring instrumentation, valve positions, switch positions, and review of completed logs, records and chemistry results. The licensee's compliance with LCO action statements were reviewed as they happened.

No violations or deviations were identified.

8. Physical Protection

The inspector verified by observation and interviews during the reporting interval that measures taken to assure the physical protection of the facility met current requirements. Areas inspected included the organization of the security force, the establishment and maintenance of gates, doors, and isolation zones in the proper condition, that access control and badging were proper, and procedures were followed.

No violations or deviations were identified.

9. Maintenance and Surveillance Review

The inspector witnessed and reviewed the results of selected maintenance and surveillance activities during this inspection interval. The activities were reviewed to ensure that test instrumentation was calibrated, results of surveillance met the acceptance criteria, post maintenance testing was conducted by qualified personnel, and approved procedures were being used. LCOs were reviewed to ensure they were met during the activities and that the system was restored to normal at the completion of the activity.

No violations or deviations were identified except as noted in paragraph 11 of this report.

10. Review of Nonrouting Events Reports by the Licensee (Unit 1)

The following Licensee Event Reports (LERs) were reviewed for potential generic impact, to detect trends, and to determine whether corrective actions appeared appropriate. Events which were reported immediately were reviewed as they occurred to determine if Technical Specifications (TS) were satisfied.

All LERs were reviewed in accordance with the current NRC enforcement policy.

- (Closed) LER 83-141, Snubber failure due to transient in the main steam line.
- (Closed) LER 84-008, Reactor trip due to low-low level in steam generator "B".
- (Closed) LER 84-009, Reactor trip due to low-low level in steam generator "C".
- (Closed) LER 84-010, Manual reactor trip following a trip of plant loads on bus underfrequency.
- (Closed) LER 84-011, Reactor trip due to turbine trip caused by low discharge pressure on shaft-driven oil pump.

11. Fire Protection Program Implementation (64704)

The inspector reviewed the fire protection program and implementing documentation to ascertain whether the licensee is implementing a program for fire protection and prevention that is in conformance with regulatory requirements, commitments in the application and industry guides and standards. The following aspects of the fire protection program were reviewed.

- Control of combustible materials in safety-related areas
- Flammable and combustible liquid and gas usage control in areas containing safety-related equipment and components.
- Control of welding, cutting and grinding operations and other activities involving open flame ignition sources in safety-related areas
- Housekeeping properly maintained in safety-related areas
- Fire brigade training and drills
- Fire brigade equipment storage and maintenance
- Testing and maintenance of fire protection systems and equipment installed for protection of safety-related areas
- Adherence to approved work authorizations for construction or maintenance activities in progress.

The following documents were used for reference:

Quality-Related Plan for Fire Protection, letter dated October 15, 1982 FSAR, Chapter 9.5

Fire Protection Evaluation, V. C. Summer

Regulatory Guide 1.120, Fire Protection Guidelines for Nuclear Power Plants

Regulatory Guide 1.39, Housekeeping Requirements for Water Cooled Nuclear Power Plants

Technical Specifications

Station Administrative Procedure (SAP)-131, Revision 0

Nuclear Education and Training Group Manual

Fire Protection Procedures (FPPs)

Findings in this area were acceptable with the following exceptions.

TS 6.8.1.f requires that written procedures be established, implemented and maintained for the fire protection program. Preventative Test Procedure (PTP)-114.002, Fire Extinguisher Checks, implements the licensee's commitment in the Fire Protection Evaluation (FPE) concerning fire extinguishers. This commitment, described on page 5.0-34a of the FPE, requires a monthly fire extinguisher inspection. Contrary to the above, during plant tours on March 2, 1984 and March 20, 1984, the inspector identified fire extinguishers that had not received the monthly inspection delineated in PTP-114.002. Specifically, on March 2, 1984, the inspector observed fire extinguisher No. 664 being utilized for backup fire suppression capability in the vacinity of an inoperable Intermediate Building fire door. The subject fire extinguisher, No. 664, had not been inspected since September 1, 1983. Inspector followup on this item determined that fire extinguisher No. 664 is one of a group of twenty fire extinguishers issued to the Mechanical Maintenance (MM) Department for utilization by fire watches. A review of the administrative controls established to implement the MM portion of this program determined them to be inadequate for control of these extinguishers. This failure to adequately implement PTP-114.002 is a violation of TS 6.8.1.f (84-08-01).

During a plant tour on March 20, 1984, the inspector identified two additional fire extinguishers that had not received their monthly inspection as required by PTP-114.002. These extinguishers, wall mounted units Nos. 34 and 37, had last been inspected on February 12, 1984. Inspector followup on these extinguishers determined that the monthly fire extinguisher surveillance portion of PTP-114.002 had been signed off as successfully performed on March 10, 1984. The inspector informed the licensee of this finding on March 20, 1984, and the licensee immediately reperformed the monthly extinguisher check. No other fire extinguishers were identified as not being inspected during this March 20, 1984 performance of PTP 114.002. This failure to adequately implement the monthly extinguisher check required by PTP-114.002 is a violation of TS 6.8.1.f and as such is a second example of violation (84-08-01).

Fire Protection Procedure (FPP)-003, Control of Transient Combustibles, states in paragraph 5.2.1, under general provisions for transient fire loads in rooms containing safety-related equipment that transient combustibles will be removed or protected from ignition sources in all areas. FPP-003 defines transient combustibles as any combustibles or flammable material that is not permanently installed or in a designated storage area.

On March 8, 1984, during a tour of the service water pump house, the inspector observed an open, partially filled can of motor oil immediately adjacent to service water pump "B", not a designated storage area. When informed of this observation, licensee personnel

immediately moved the can of motor oil to a designated storage area. On March 12, 1984, during a tour of the emergency Diesel Generator (DG) "A" room, the inspector observed a wooden storage box, approximately 4 ft. by 4 ft, located adjacent to the DG "A" local control panel. Additionally, a poly bottle containing what the inspector believed to be fuel oil was observed to be stored adjacent to the DG "A" fuel oil day tank. The licensee was informed of these findings and the aforementioned combustibles were immediately removed. These failures to adequately control transient combustibles as required by FPP-003 are violations of TS 6.8.1.f and as such are examples three and four of violation (84-08-01).

Fire Protection Procedure (FPP)-005, Burn Permit, is the licensee's procedure controlling activities involving cutting, grinding, open flame or welding operations. FPP-005 requires that for work requiring a burn permit, combustible materials within a 35 foot radius of the work area be removed or covered with non-flammable materials and open deck gratings directly below the work area be covered with nonflammable material. Additionally, FPP-005 requires than when welding and/or cutting (torch) is to be performed, protective screens shall be used to protect passers by from eye flashburns. Contrary to the above, on March 12, 1984, the inspector observed a welder conducting welding operations on the 436 ft. elevation of the Turbine Building without screens for eye passerby protection or non-flammable materials covering the open deck grating directly below the area in which the welder was working, also without removing or covering the combustible material (wood scaffolding deck) located approximately six feet below the deck grating. This failure to comply with the requirements of FPP-005 is a violation of TS 6.8.1.f and as such is the fifth example of violation (84-08-01).

b. During review of the fire protection training programs which implement the qualification and training requirements for personnel performing fire protection activities, the inspector noted the absense of established training and qualifications requirements for roving fire watches and personnel performing fire barrier inspections. Inspector review of this item determined that although training and qualification requirements had not been formally established, the personnel performing those activities had received training commensurate with their responsibilities. The licensee has committed to formally establishing qualification and training requirements for these activities to ensure that suitable proficiency is maintained. This is an inspector followup item (84-08-02).

12. Review of Previous Inspection Findings

(Closed) IFI 83-34-02, Leak in socket weld on RHR pump "B" seal cooler piping. The inspector reviewed documentation for the repair of the subject weld which was performed on January 5, 1984.

(Closed) IFI 83-36-01, Fire door automatic closure mechanism inoperable. The inspector reviewed documentation associated with the corrective maintenance and performed a visual inspection on the subject fire door. At the time of this inspection, the door automatic closure mechanism was functioning properly.

13. Review of Bulletin Responses

(Closed) 82-BU-01, Alteration of Radiographs of Welds in Piping Sub-assemblies. This bulletin was sent to this licensee for information only. No further action is required.

(Closed) 82-BU-02, Degradation of Threaded Fasteners in Reactor Coolant Pressure Boundary of PWR Plants. This bulletin at the time of issuance was information only for this facility. Nevertheless, recommended preventive measures and practices have been incorporated into the licensee maintenance procedures, as well as, component inspection requirements addressed by this bulletin. No further action is required.

(Closed) 83-BU-05, ASME Nuclear Code Pumps and Space Parts Manufactured by Hayward Tyler Pump Company. The licensee in a letter dated August 24, 1983, stated that SCE&G has not procurred, nor plans to procure any ASME Nuclear Code Pumps or spare parts from Hayward Tyler Pump Company. No further action is required.