

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

84 JULY 29, P 1984 2

Mr. J. P. O'Reilly,
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street, N.W.
Atlanta, GA 30323

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
NRC IE Bulletin No. 84-02

Dear Mr. O'Reilly:

On March 12, 1984, the Nuclear Regulatory Commission (NRC) issued IE Bulletin No. 84-02, "Failure of General Electric Type HFA Relays in Use in Class 1E Safety Systems." Licensees were requested to develop plans and schedules for replacing nylon or Lexan coil spool-type HFA relays, develop and implement surveillance plans, provide a basis for continuing operation and review the general concerns expressed in the bulletin for applicability to their facility.

With the issuance of NRC IE Notices 81-01 and 82-13, South Carolina Electric and Gas Company (SCE&G) became aware of the Staff's concern with the failures of General Electric (GE) HFA relays. A subsequent investigation performed by SCE&G identified the utilization of HFA relays in GE supplied 7.2KV switchgear. This was the only application of GE HFA relays in a class 1E safety system at the Virgil C. Summer Nuclear Station.

Action was taken to replace the HFA relays installed in the 7.2 KV switchgear with the new GE "Century Series" HFA relays. The replacement of the HFA relays was completed on January 23, 1984. HFA relays in non-1E safety systems are considered acceptable as installed and will not be replaced. Additionally, the safety classification of all HFA relays, with the exception of the Century Series, has been downgraded for use in non-1E applications. To ensure that the older and problematic HFA relays are not inadvertently used in class 1E safety systems, the safety class and non-safety class relays are physically segregated and administratively controlled.

A review of the general concerns expressed in the bulletin was performed to determine if other relays used in safety-related applications had experienced similar failures. A review of past operating history gave no indications of relay failures resulting

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Mr. J. P. O'Reilly
NRC IE Bulletin No. 84-02
July 9, 1984
Page #2

from degradation of component materials. SCE&G, as part of an existing program, reviews manufacturers' technical information upon receipt to determine applicability and to initiate any necessary corrective action. This program ensures that a proper evaluation of technical information is performed and documented.

As requested, SCE&G provides the following man-hour estimate for both replacing the HFA relays and subsequently preparing this response:

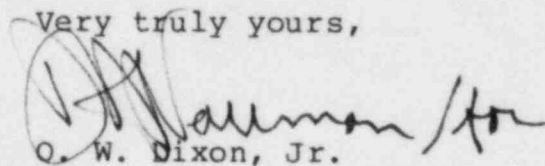
Approximately 600 Operations related man-hours which includes a visual examination, surveillance, tag-out of circuits and replacement of relays.

Approximately 135 Engineering related man-hours which includes a determination of affected equipment, visual examination, initiation of a modification package, procurement of materials and response to the bulletin.

I declare the statements and matters set forth herein are true and correct to the best of my knowledge, information and belief.

Should you have any questions, please contact us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

WRM/OWD/gj

cc: (see page #3)

Mr. J. P. O'Reilly
NRC IE Bulletin No. 84-02
July 9, 1984
Page #3

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