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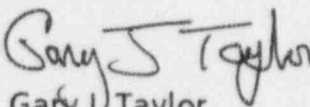
Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 95-13

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Level IV violation delineated in NRC Inspection Report No. 50-395/95-13.

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

Very truly yours,


Gary J. Taylor

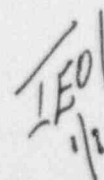
CJM/GJT/nkk
Attachment

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NUCLEAR EXCELLENCE - A SUMMER TRADITION!



RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/95-13-01

I. RESTATEMENT OF NRC VIOLATION

Technical Specifications 6.8.1.c requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Section 1.d of Appendix A, recommends administrative procedures for controlling procedure adherence.

System Operating Procedure, SOP-501, HVAC Chilled Water System, Precaution number 16 states in part, "When aligned for single Train Chilled Water operation, the following should be placed in MAN on the operating Chilled Water Train: XFN-83A(B), EFP CLG FAN A(B)."

Station Administrative Procedure, SAP-131A, Attachment I, Fire Detection Instrumentation, states in part, "Within one hour after declaration of inoperability an hourly fire watch patrol shall have begun inspection of the zone(s) with the inoperable instrument(s) and shall be completed within one hour after the beginning of the patrol."

Fire Protection Procedure, FPP-004, Duties of a Fire Watch, Section 5.3.3, states that the roving fire watch "Must patrol through the affected room or area once per hour until relieved by another roving fire watch or until directed by the fire protection representative to discontinue the patrol."

Contrary to the above requirements,

1. On July 16, 1995, while swapping from train "A" to train "B" single train chilled water operation, the licensee failed to place emergency feedwater pump cooling fan XFN-83B in manual. This resulted in higher than expected temperatures in the turbine driven emergency feedwater pump room.
2. On July 24, 1995, after declaring a portion of the fire detection system inoperable, the licensee failed to adequately establish an hourly fire watch patrol to inspect all affected zones. As a result, both emergency diesel generator rooms were not inspected by the hourly roving fire watch for a period of approximately 11 hours.
3. On July 24, 1995, the licensee established an hourly roving fire watch patrol to inspect rooms in the lower two levels of the diesel building. The fire watch failed to patrol through the rooms on the lower level for a period of approximately eight hours.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

The following is provided for each example:

1. SCE&G considers the failure to place ventilation fan XFN-83B in manual, during the system realignment on July 16, to be inattention to detail by operations personnel. The procedure used for this task is considered to provide adequate direction and there has been no previous incidents of this nature during its implementation.
2. The second example of this violation is also considered to have resulted from inattention to detail. The Fire Protection Officer (FPO) was involved in an incident where he evaluated conditions for two separate fire protection panels and erroneously selected the wrong zone for the fire watch.
3. The third example of this violation is the result of an inadequate procedure. Fire Protection Procedure FPP-004, "Duties of a Fire Watch," did not provide adequate instructions to address those situations where a roving fire watch was established for zones which contain either confined space or radiological entry controlled spaces.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The following is provided for each example:

1. In response to the NRC Resident Inspector inquiry on July 18, operations personnel went to the emergency feedwater pump room and verified the actual temperature. As noted in the inspection report, the temperature was slightly higher than what is considered to be normal for this area and the ventilation fan was found to be in automatic (not running) vs. its required mode of manual operation. Procedure compliance was reestablished at this time by placing the fan in manual operation. There was no adverse environmental impact to the safety-related components in this area from the slightly elevated room temperature.
2. The failure to establish a roving fire watch for the zone covered by fire protection panel RIAC 12 was identified during a review by fire protection personnel on July 25.

There were no immediate steps required for this error since component repairs had been completed on the previous day and the system was currently operable.

3. Following identification that the fire watch had not physically entered all areas; an atmospheric test was performed for the confined space in the diesel building and following receipt of clearance the roving fire watch physically entered the room on subsequent patrols.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The following is provided for each example:

1. Operations management discussed this event with the shift on duty at the time of the alignment error to emphasize expectations for performance of their duties and need to comply with procedures.

The operations shift was then directed to produce and present a human performance program (STAR) video on the event for review by other department personnel. This action has been completed.

2. The FPO that selected the wrong fire watch zone has been counseled by management on the importance of accuracy and expediency during the performance of his duties.

In addition, the results of a root cause analysis for this event will be reviewed by all FPOs to stress the importance for second checks and effective review. This action will be complete by October 13, 1995.

3. SCE&G is developing new guidance for performance of fire watch duties which will address management expectations for patrol of radiological and inaccessible areas. This guidance will be addressed in future fire watch training and new Fire Protection Procedure FPP-020, "Program Administration." FPP-020 is expected to be issued by November 1, 1995.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance by November 1, 1995.