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Washington, DC 20555

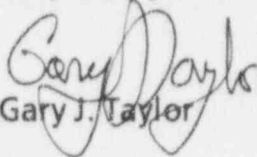
Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT 95-17

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Notice of Violation delineated in NRC Inspection Report No. 50-395/95-17. SCE&G is in agreement with the violation, and the enclosed response addresses the reason and corrective actions being taken to prevent recurrence.

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

Very truly yours,

  
Gary J. Taylor

JWP/GJT/nkk  
Attachment

c: J. L. Skolds	NRC Resident Inspector
O. W. Dixon	J. B. Knotts Jr.
R. R. Mahan (w/o attachment)	K. R. Jackson
R. J. White	NSRC
S. D. Ebnetter	Central File System
S. Dembek	RTS (IE 951701)
S. F. Fipps	File (815.01)

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Q PDR



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RESPONSE TO NOTICE OF VIOLATION  
NUMBER 50-395/95-17-01

I. RESTATEMENT OF NRC VIOLATION

10CFR50 Appendix B Criterion XVI requires, in part, that measures be established to assure that conditions adverse to quality such as nonconformances are properly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, effective measures were not taken to assure the cause of a significant condition adverse to quality in the Fuel Handling Building (FHB) Exhaust System was determined and corrected. On September 24, 1995, a problem with adequate FHB differential pressure was identified. The licensee's corrective actions in response to this problem were inadequate, in that, the cause of the inadequate differential pressure measurements was not promptly identified and corrected prior to moving fuel in the FHB during the period October 9 through 12, 1995.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

The differential pressure alarm for the Fuel Handling Building Ventilation System has no safety function and is not used to verify operability of this system. The annunciator response procedure for this alarm did not make note of the possibility that the operability of the Fuel Handling Building Ventilation System should be questioned. The alarm had two different setpoints of -.125 inches of water vacuum rising and -.25 inches decreasing. The surveillance test procedure defines -.125 inches as acceptable. The operability of the Fuel Handling Building Ventilation System is determined every 18 months by the use of field standard equipment. Operations personnel assumed that the alarm was "locked in" due to an instrumentation problem which was being addressed under an existing Maintenance Work Request. Operations personnel had previously completed actions specified in the annunciator response procedure to verify the integrity of the Fuel Handling Building and to ensure that the ventilation system was properly aligned and in operation. The failure to follow-up on the possibility that this non-safety alarm could be an indication of a problem with safety related portions of the Fuel Handling Building Ventilation System is considered to be the cause of the violation.

IV. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Local instrumentation for detection of the Fuel Handling Building differential pressure was utilized for a subsequent fuel movement along with a local alarm. Mechanical adjustments to dampers within the ventilation system have been corrected. The ventilation system exhaust capabilities have been enhanced by altering the pitch on the exhaust fans. This has provided for additional margin in maintaining the differential pressure for the Fuel Handling Building. The surveillance task to determine differential pressure was performed satisfactorily after the changes were made.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The Annunciator Response Procedure is being revised to provide additional guidance upon receipt of a differential pressure alarm during fuel movement. The "high" differential pressure alarm will be eliminated to reduce the potential for confusion. Reliable instrumentation for the Fuel Handling Building differential pressure monitoring and alarm will be utilized during future fuel movement to ensure the capability of the ventilation system is maintained.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance with respect to the corrective actions stated above, by April 14, 1996.