

SOUTH CAROLINA ELECTRIC & GAS COMPANY

ATLANTA, GEORGIA

COLUMBIA, SOUTH CAROLINA 29218

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

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21 November 16, 1984

Mr. James P. O'Reilly
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II, Suite 2200
101 Marietta Street, N.W.
Atlanta, Georgia 30323

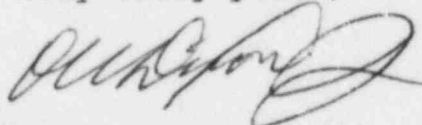
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 84-29

Dear Mr. O'Reilly:

Attached is South Carolina Electric and Gas Company's response for the Violations as addressed in Enclosure 1 of NRC Inspection Report 84-29.

If there are any questions, please call us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

CJM:OWD/lcd
Attachment

cc: V. C. Summer
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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 84-29
ITEM 1

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the violation as stated.

II. REASON FOR THE VIOLATION

The failure to promptly identify and correct the indication error in Overpower Delta Temperature Protection Channel ITI-422B was due to two (2) personnel errors.

- A. Technical Specification channel checks performed at the Virgil C. Summer Nuclear Station are controlled by Special Instruction (SI) 84-04, "Operating Logs/Firewatch Logs." SI 84-04 provides logs in which the operators record Plant indications and then compare these indications with independent channels for a qualitative assessment of channel behavior. To aid in this assessment, SI 84-04 also provides Technical Specification limits for the instrument channels as well as FSAR Table 7.5-2, which specifies indication accuracy of control room indicators and recorders. When a Technical Specification limit is exceeded, the operator identifies the discrepancy to the Shift Supervisor for determination of acceptability as compared to FSAR Table 7.5-2.

FSAR Table 7.5-2 allows for a meter accuracy of $\pm 4\%$ of full power delta temperature. Prior to September 25, 1984, Operations personnel had incorrectly interpreted the accuracy of $\pm 4\%$ to apply to full span (150%) of indicator ITI-422B. As a result of this misinterpretation, an error of 6% had been used in the calculation of maximum allowable indication ($109\% + 6\%$) instead of $109 \pm 4\%$ required by FSAR Table 7.5-2.

- B. The Supervisor of Operations directed the Shift Supervisor and the Instrument and Control Section (I&C) to initiate repairs to ITI-422B after the NRC Resident Inspector identified the indication error on September 25, 1984. The Shift Supervisor verified that the actual overpower delta temperature setpoint was within Technical Specification limits by monitoring the Plant computer prior to initiating a Maintenance Work Request (MWR) to effect repairs to the indicator.

ENCLOSURE 1 Continued

II. REASON FOR THE VIOLATION - continued

The second personnel error occurred on the evening of September 25, 1984, when the I&C Section inadvertently directed their efforts towards the repair of ITI-432D (TAVG), which also had an indication problem. On September 26, 1984, the failure to repair ITI-422B was identified and the MWR escalated to a Priority 1 (work immediately to completion). I&C confirmed that the protection function of the channel was not affected by the indicator inaccuracy.

III. ACTIONS TAKEN AND RESULTS ACHIEVED

The indication portion of the overpower delta temperature protection channel was calibrated on September 26, 1984. The calibration confirmed that the high readings observed by Operations on their channel checks were due to instrument drift of the indicator and did not compromise the operability of the protection channel.

IV. CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

The Licensee will include the below listed topics in the next Operator Requalification Training Program which is scheduled to begin November 26, 1984, and end on January 7, 1985. The addition of these items in the training program are designed to prevent a potential recurrence of this Violation.

1. Use and Interpretation of FSAR Table 7.5-2.
2. The purpose and scope of Technical Specification Channel Checks.
3. Prompt identification and resolution of adverse indications.

V. DATE OF FULL COMPLIANCE

The Licensee will be in full compliance upon completion of the requalification training program presently scheduled for completion on January 7, 1985.

ENCLOSURE I
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 84-29
ITEM 2

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the violation as stated.

II. REASON FOR THE VIOLATION

The noncompliance with Fuel Handling Procedure (FHP)-607 on October 1, 1984, was the result of personnel error. The Supervisor in charge of the receipt, inspection and storage of the new fuel assemblies failed to perform an adequate review of FHP-607 prior to beginning the task. The Supervisor had received new fuel prior to this date and was relying on his memory and experience.

III. ACTIONS TAKEN AND RESULTS ACHIEVED

The violation was identified during receipt of the last fuel assembly so there was no immediate corrective action taken in regards to the usage of the 5000 pound spring scale or failure to maintain a Fuel Handling Building Log Book. The Licensee reviewed the fuel movement activities performed during the procedure noncompliance and found them to be acceptable with the exception of the noted violations. There was no damage to the new fuel assemblies.

IV. CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

Fuel Handling Supervisors involved in the receipt of fuel assemblies were counseled on the importance of procedure adherence on October 1-3, 1984.

V. DATE OF FULL COMPLIANCE

The Licensee was in full compliance on October 1, 1984.