

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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December 27, 1984

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

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

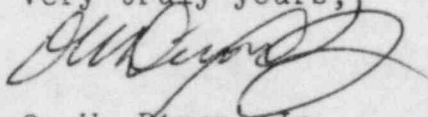
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 84-31

Dear Mr. O'Reilly:

Attached is South Carolina Electric and Gas Company's response for the Violation as addressed in Enclosure 1 of NRC Inspection Report 84-31.

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	C. L. Ligon (NSRC)
T. C. Nichols, Jr./O. W. Dixon, Jr.	K. E. Nodland
E. H. Crews, Jr.	R. A. Stough
E. C. Roberts	G. Percival
W. A. Williams, Jr.	C. W. Hehl
D. A. Nauman	J. B. Knotts, Jr.
Group Managers	I & E (Washington)
O. S. Bradham	NPCF
C. A. Price	File
D. A. Lavigne	

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PDR ADOCK 05000395
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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 84-31

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

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

II. REASON FOR THE VIOLATION

The violation is attributed to procedural inadequacies. General Test Procedure (GTP) 302, "General Procedure for Inservice Testing of Valves," established, for valves with remote indication, the programmatic requirement to verify agreement of actual valve position with remote indication at least every two (2) years. However, the applicable Surveillance Test Procedures (STP) failed to implement this specific requirement.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

During the period of November 21 to December 15, 1984, prior to reactor startup after the refueling outage, all valves that are accessible with remote position indication were stroke tested, and the remote valve indications were verified against the actual valve open/closed positions. The exceptions were solenoid valves whose valve movement cannot be locally observed and four (4) motor operated valves which are encapsulated for containment integrity. Exemption to the requirements of ASME Boiler & Pressure Vessel Code (B&PV), Section XI, Subsection IWV-3000 will be requested for these valves.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The applicable STPs will be revised to implement the inservice testing of valves with remote position indication in accordance with the requirements of ASME B&PV Code, Section XI, Subsection IWV-3000.

V. DATE OF FULL COMPLIANCE

South Carolina Electric and Gas Company will be in full compliance by June 30, 1985.