

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

84 OCT 5 P 3:06
September 25, 1984

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

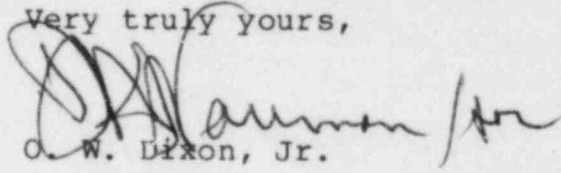
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 84-23

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 84-23.

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 84-23

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

XVT-3016 is a one (1) inch sample isolation valve located on the Sodium Hydroxide (NAOH) Storage Tank. The valve is not required to be locked for any plant safety concerns; however, due to the corrosive characteristics of NAOH, administrative controls were established on the valve position in Special Instruction (SI) 84-05, "Locked Valve Control."

An investigation performed subsequent to the identification of the violation by the NRC Resident Inspector failed to determine exactly when the locking device was removed. However, the Licensee believes the noncompliance with SI 84-05 most likely occurred when a chemistry sample was obtained on April 13, 1984. The violation is attributed to personnel error caused by a lack of coordination between Operations and Chemistry personnel.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A locking device was immediately installed on Sodium Hydroxide Tank Sample Isolation Valve XVT-3016 after identification of the noncompliance by the NRC Resident Inspector. The installation of the locking device on July 6, 1984, reestablished administrative control of valve position.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The following actions were taken to prevent further violation:

- A. Chemistry personnel were required to review the Locked Valve Control program as identified in SI 84-05. This review was completed on July 20, 1984.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION (cont'd)

B. On July 20, 1984, the Director, Nuclear Plant Operations tasked all departments at the Virgil C. Summer Nuclear Station to emphasize the importance of the Locked Valve Control program to their respective employees. This action was completed on September 14, 1984.

V. DATE OF FULL COMPLIANCE

South Carolina Electric and Gas Company was in full compliance on September 14, 1984.