



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4344

Gary J. Taylor
Vice President
Nuclear Operations

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Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATIONS A, B, C, AND D
NRC INSPECTION REPORT 96-05

Attached are the South Carolina Electric & Gas Company (SCE&G) responses to the four Level IV violations delineated in NRC Inspection Report No. 50-395/96-05.

If there are any questions, please contact Mr. M. J. Zaccone at (803) 345-4328.

Very truly yours,

Gary J. Taylor

MJZ/CJM/RAM/GJT:nkk
Attachments (4)

c: J. L. Skolds
W. F. Conway
R. R. Mahan (w/o attachment)
R. J. White
S. D. Ebnetter
A. R. Johnson
NRC Resident Inspector
S. F. Fipps
K. R. Jackson
J. B. Knotts Jr.
NSRC
RTS (IE 960501, 960502, 960504, and 960506)
File (815.01)
DMS (RC-96-157)

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PDR ADOCK 05000395
G PDR



NUCLEAR EXCELLENCE - A SUMMER TRADITION!

JEOL 11

ATTACHMENT I
RESPONSE TO NOTICE OF VIOLATION A
NUMBER 50-395/96-05-04

I. RESTATEMENT OF NRC VIOLATION

10 CFR 50.73(a), Licensee Event Report System, requires that the holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after the discovery of the event.

10 CFR 50.73(a)(2)(i)(B) states that the licensee shall report any operation or condition prohibited by the plant's Technical Specifications (TS).

Contrary to the above, on March 18 the licensee had not submitted an LER for an event of the type described in 10 CFR 50.73(a) within 30 days after the discovery of the event. On February 9, 1996, the plant entered TS 4.0.3 for failure to perform TS surveillance requirements on both trains of the Control Room Emergency Ventilation System and the Fuel Handling Building Exhaust System. This failure was a condition prohibited by the plant's TS.

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

TS 4.0.3 states in part "The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance . . .". It was SCE&G's licensing interpretation that if the surveillance was completed within the 24 hour period then the action requirement of the TS was fulfilled. Therefore, SCE&G did not consider itself outside the Limiting Condition for Operation (LCO).

After numerous discussions with the NRC Resident Inspector, Region II management, and NRR, SCE&G felt that the intent of our notification and disclosure had been fulfilled, eliminating the need to submit an LER for this event.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

SCE&G submitted LER 960003 on April 26, 1996, to meet the reporting requirements of 10CFR50.73(a)(2)(i)(B).

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

SCE&G considers this event to be an isolated incident. The misinterpretation has been discussed with appropriate Licensing personnel.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is currently in full compliance.

ATTACHMENT II
RESPONSE TO NOTICE OF VIOLATION B
NUMBER 50-395/96-05-01

I. RESTATEMENT OF NRC VIOLATION

Technical Specification (TS) 6.8.1.c require that written procedures be established, implemented and maintained covering surveillance and test activities of safety-related equipment.

General Test Procedure, GTP-006, General Procedure for System Leakage Assessment, revision 5, requires that an integrated leakage assessment shall be recorded on Attachment 1.

Contrary to the above, written procedures were not implemented covering surveillance and test activities of safety-related equipment. For the Fall 1994 and Spring 1993 outages, the integrated leakage assessments were not recorded on the GTP-006 Attachment 1 data sheet.

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 Test Unit data recording and retention techniques did not provide adequate verification to ensure that all data was properly recorded on the sheets.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

During the most recent surveillance period, the data was properly recorded on GTP-006, Attachment I, data sheets. The tracking for this information has been upgraded from a Preventative Maintenance Task Sheet (green sheet) to a Surveillance Test Task Sheet (pink sheet).

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The personnel responsible for performing and documenting the integrated leakage assessment have been briefed on this problem and counseled on recording of data.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is currently in full compliance.

ATTACHMENT III
RESPONSE TO NOTICE OF VIOLATION C
NUMBER 50-395/96-05-02

I. RESTATEMENT OF NRC VIOLATION

10 CFR 50 Appendix B, Criterion XVI, Corrective Actions, states, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances are properly identified and corrected.

Contrary to the above, in May 1995, a condition adverse to quality was identified but not corrected on the spent fuel pool cooling B train heat exchanger isolation valve XVT06659-SF. The valve was identified as leaking past its seat. The failure to adequately correct the deficiency resulted in approximately 500 gallons of water being drained from the Spent Fuel Pool to the Recycle Holdup Tank in March 1996.

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 Systems Engineer made an inappropriate evaluation with respect to the system configuration under which the leakage assessment was performed.

Additionally, Operations communication of the amount and potential impact of leakage was not provided in a timely manner to the evaluating engineer.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Personnel were made aware of the amount and impact of the leakage. The actual condition of the valve used to isolate the spent fuel pool cooling B train heat exchanger, XVT06659-SF, has been assessed.

Additionally, Maintenance Work Request 96O3736 was generated to repair XVT06659-SF as necessary.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

Systems Engineering personnel have been counseled with respect to followup when evaluating leakage to assure assessment takes into account changes to the system configuration from the initial leakage observation.

Maintenance Work Request 96O3736 documents the impact of the valve condition and provides adequate communication to the evaluating engineer.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is currently in full compliance.

ATTACHMENT IV
RESPONSE TO NOTICE OF VIOLATION D
NUMBER 50-395/96-05-06

I. RESTATEMENT OF NRC VIOLATION

Technical Specification (TS) 6.8.1.d require that written procedures be established, implemented and maintained covering the Security Plan.

Security Procedure, SPP-202, Vehicle Access Requirements, revision 9, requires that the vehicle escort officer ensure the vehicle is secured by obtaining all available sets of vehicle keys from the operator and by locking the steering column. If the steering column cannot be locked, the escort officer shall lock the cab of the vehicle.

Contrary to the above, written procedures were not implemented covering the Security Plan. On April 16, 1996, a vehicle controlled by SPP-202 was found with the steering column and the cab not locked.

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 vehicle escort officer did not to obtain all available sets of the vehicle keys, as required by security procedures. Failure to comply with the station's procedures was an oversight by the officer involved.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

All sets of available keys for the vehicle were confiscated and the vehicle secured.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The security officer involved has been counseled. All security officers have been briefed on this incident and the correct procedural method of securing a vehicle. Security supervisors have been instructed to emphasize procedural compliance for all tasks.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is currently in full compliance.