SCE&G
A SCANA Company

South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4040

John L. Skolds
Vice President
Nuclear Operations

December 17, 1992

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 VIOLATION
NRC INSPECTION REPORT 92-19

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the two violations delineated in NRC Inspection Report No. 50-395/92-19.

SCE&G is in agreement with violation 92-19-01 and is not in agreement with violation 92-19-02. The basis for this disagreement is contained within the attached reply.

Should you have any questions, please contact Mr. Wesley R. Higgins at (803) 345-4042.

Very truly yours,

John L. Skolds

WRH:JLS:smd

Attachment

c: O. W. Dixon
R. R. Mahan
R. J. White
S. D. Ebneter
General Managers
L. D. Shealy
NRC Resident Inspector
J. B. Knotts Jr.
J. W. Flitter
NSRC
RTS (IE 921901 & IE 921902)
File (815.01)

9212210335 921217
PDR ADOCK 05000395
Q PDR

IE01

RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-39[illegible]-92-01

I. RESTATEMENT OF VIOLATION

Technical Specification 4.3.1.1 requires that each reactor trip system automatic trip logic be demonstrated operable by performance of the surveillance requirements specified in Table 4.3-1. Line Item 2[illegible] of Table 4.3-1 for the reactor trip bypass breakers references Notation (13) for the requirement to perform a trip actuating device operational test. Notation (13) of Table 4.3-1 requires the breaker be tripped via the "Local manual shunt trip (LMST) prior to placing breaker in service."

Contrary to the above:

On October 23, 1992, the trip actuating device operational test that was performed on the reactor trip bypass breaker prior to placing it in service did not test the shunt trip feature of the breaker. This resulted from inadequate procedural controls and equipment labeling. Also, testing of the reactor trip bypass breaker shunt trip feature during previous surveillances could not be assured due to the same inadequate controls and labeling.

II. SCE&G POSITION ON THIS VIOLATION

SCE&G agrees with the violation as stated above.

III. REASONS FOR THE VIOLATION

The procedures did not identify which breaker trip method to use prior to placing the bypass breakers in service. Also, labeling of the pushbuttons located on the reactor trip switchgear did not clearly define the pushbuttons' functions.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

After reviewing the event, the effects on plant safety were minimized due to no history of shunt trip operation failures, bypass breakers being installed for a short duration, and the Shunt Trip Attachment (STA) being verified every six months through additional surveillance testing.

V. CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS AND DATE FOR FULL COMPLIANCE

Enhancements were made to the surveillance procedure for Train B SSPS to clearly define tripping of the reactor trip bypass breaker via the LMST pushbutton. The surveillance procedure for Train A SSPS will be revised prior to performing the next surveillance test. Also, the LMST pushbuttons were relabeled to clearly define their function.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance by December 31, 1992.

RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/92-19-02

I. RESTATEMENT OF VIOLATION

Technical Specification 6.8.1.A requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Section 1.A of Appendix A lists equipment control as a safety-related activity that should be covered by written procedures.

Contrary to the above:

On October 29, 1992, the procedures covering the control of the "B" Emergency Diesel Generator (EDG) air start system were inadequate in that they did not insure the correct position of the selector switch for the pressure switches which autostart the air compressors, while the air start system was in an abnormal condition. This resulted in the upper air start receiver tank (XTK0009C) being overpressurized.

II. SCE&G POSITION ON THE VIOLATION

SCE&G denies the violation as stated above.

III. BASIS FOR SCE&G POSITION

SCE&G does not consider that the procedures for control of the EDG during maintenance activities are inadequate. However, a labeling deficiency contributed to a personnel error.

The danger tag procedure provided adequate guidance to isolate the air start tank for which the maintenance was being performed. The selector switch position was discussed by the Shift Supervisor with the operator performing the danger tagout prior to the actual hanging of the danger tags. Direction from the Shift Supervisor was to select the switch position for the tank which was to remain in service. Control of the switch position and its return to a normal lineup was covered by inclusion of the switch aligning the restoration section of the danger tag form. The restoration section is addressed in the danger tag procedures and requires the Shift Supervisor to address components manipulated inside the tagout boundary such that the normal alignment may be restored upon completion of the maintenance and restoration of the system to service. This provides adequate control of the component to ensure proper alignment both during and following the maintenance activity. The licensee attributes the problem with the incorrect switch position to be associated with the labeling of the switch and personnel error as described below.

On October 29, 1992, the lower air start tank (XTK0009D) for the "B" EDG was danger tagged out, isolated, and depressurized in order to change out the tank's relief valve. SCE&G had intended for the upper air start tank (XTK0009C) to remain pressurized during the valve replacement activity.

There are two pressure switches (one for each air start tank) which start and stop the air compressors that supply these tanks. On the local control panel for the EDG there is a three position selector switch for choosing either pressure switch, or both, to control the air compressors. This selector switch is normally in the "BOTH" position. The operators recognized that the switch would have to be moved to correspond to the tank that would remain pressurized. The labeling on the selector switch was not consistent with the tank designations. The three position selector switch has positions "1", "2", or "BOTH" while the two tanks have the letter designations "C" and "D". The letter designations of the tanks had been incorrectly penciled in above the selector switch positions. The operators selected the switch position associated with the depressurized air tank. The operator noted tank air pressure to be approximately 375 psig and observed the air dryer light on. This light is energized fifteen minutes prior to a compressor start. Having observed conditions appropriate for pending compressor start, the operator resumed his rounds. The air compressors subsequently received a continuous run demand signal from the pressure switch associated with the depressurized tank.

Subsequent to the installation of danger tags by Operations, it was noted by a Resident NRC Inspector that both compressors were running even though the pressure of XTK0009C was at 460 psig (pressure switch normally shuts off the compressors at 425 psig and the tank's design pressure is 430 psig).

During the tagout process, the Shift Supervisor and control room personnel discussed the proper alignment of the selector switch. This was due to the infrequent nature of this type maintenance activity and was per Station Administrative Procedure 201.

IV. CORRECTIVE STEPS TAKEN

Design Engineering performed an evaluation that showed that the EDG air start system was not overstressed as a result of this event.

The selector switch label will be revised by December 31, 1992, under modification request form (MRF-21632), "Human Factors Main Control Board Discrepancies."

All the skid mounted panels are being walked down by Operations personnel looking for other labeling discrepancies. Additionally, Nuclear Licensing and Operating Experience personnel are independently looking at all control panels for labeling discrepancies. Both walkdowns and labeling enhancements for all control panels will be completed by June 30, 1993.