SOUTH CAROLINA ELECTRIC & GAS COMPANY POST OFFICE 764 COLUMBIA. SOUTH CAROLINA 29218 All: 08 85 APR I O. W. DIXON, JR. VICE PRESIDENT March 25, 1985 1 NUCLEAR OPERATIONS Dr. J. Nelson Grace 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 85-04 Dear Dr. Grace: Attached is South Carolina Electric and Gas Company's response to the Violation as addressed in Enclosure 1 of NRC Inspection Report 85-04. If there are any questions, please call us at your convenience. Very truly yours, O. W. Dixon, CJM: OWD / dwf Attachment C. L. Ligon (NSRC) cc: V. C. Summer K. E. Nodland T. C. Nichols, Jr./O. W. Dixon, Jr. R. A. Stough E. H. Crews, Jr. G. Percival E. C. Roberts C. W. Hehl W. A. Williams, Jr. J. B. Knotts, Jr. D. A. Nauman I & E (Washington) Group Managers O. S. Bradham NPCF File C. A. Price S. R. Hunt 8505200059 850409 PDR ADDCK 05000395

ENCLOSURE 1 RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 85-04

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 failure to maintain the Category "R2" Test Status Chart in accordance with Station Administrative Procedure (SAP) 134, "Control of Station Surveillance Test Activities," is attributed to personnel error. Since the violation occurred over multiple shifts, the Licensee considers the root cause of the personnel error to be a lack of attention to detail by Operations personnel.

A second example of this violation was discussed with the NRC Resident Inspector on March 8, 1985. The inspector had previously observed that the Operation's Key Log was not being maintained in accordance with SAP-140, "Plant Key Control." Specifically, discrepancies were noted on entries by the key custodian (Shift Supervisor) acknowledging issuance or receipt of keys for the safeguard cabinets.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The Manager, Operations has addressed the need to improve management control of activities in a series of supervisor meetings completed on March 14, 1985. The increased management attention is expected to prevent future program violations.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

Increased management emphasis will continue to be placed on control of activities affecting safety-related equipment at the Virgil C. Summer Nuclear Station. Additionally, the response to this violation will be placed in the required reading for licensed operator review. The review will be completed by May 1, 1985, and is expected to prevent further violation.

V. DATE OF FULL COMPLIANCE

South Carolina Electric and Gas Company will be in full compliance by May 1, 1985.