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July 17, 1997
RC-97-0144

U. S. Nuclear Regulatory Commission
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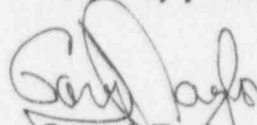
Gentlemen:

Subject: REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-395/97-02
VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12

Attached is the South Carolina Electric and Gas (SCE&G) response to the Notice of Violation delineated in NRC Inspection Report No. 50-395/97-02. SCE&G is in agreement with the violation and the enclosed response addresses the corrective actions being taken to prevent recurrence.

Should you have any questions, please call at your convenience.

Very truly yours,



Gary J. Taylor

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ljm
Attachment

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NUCLEAR EXCELLENCE - A SUMMER TRADITION!

I. RESTATEMENT OF NRC VIOLATION

10 CFR 50.65 (a)(1) requires that each licensee shall monitor the performance or condition of structures, systems, or components, against licensee-established goals in a manner sufficient to provide reasonable assurance that such structures, systems, and components are capable of fulfilling their intended functions. It also states that when the performance of a structure, system, or component does not meet established goals, appropriate corrective action shall be taken.

Contrary to the above, from July 10, 1996, the licensee did not monitor the performance of the Leakage Detection System (LD) against established goals, in that, LD components were not capable of fulfilling their intended functions and appropriate corrective action was not taken.

II. REASON FOR THE VIOLATION

The cause of this violation was noncompliance with Station Administrative Procedure SAP-1141, "Nonconformance Control Program." Specifically, paragraph 6.2.6.A.1 requires that if the implementation time for a Nonconformance Control Notice (NCN) is less than 90 days but the disposition is not implemented within 90 days, the NCN shall be routed to System & Component Engineering for a re-evaluation. NCN 5304, which was written in January, 1996, and revised in March, 1996 to include ILS01914 and ILS01967, provided a "rework" disposition (to make a nonconforming item conform to its original design configuration by replacement, remachining, reassembling or other corrective means). However, the rework was not implemented within 90 days nor was the NCN routed to Engineering for re-evaluation.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

- a. Condition Event Report (CER) 97-0476 was written to address the Nonconformance Control Program issue. As an interim action, site Quality Control (QC) has taken responsibility for tracking NCNs to ensure that those which require corrective action and are not field complete within 90 days are sent to Engineering for evaluation. As a result of this, QC reviewed all open NCNs and has identified a few rework NCNs which were not field complete within 90 days of the disposition date. Each of these NCNs have been appropriately evaluated by Engineering and determined to have no impact on the Maintenance Rule.

- b. Several level switches, including ILS01914, ILS01966 and ILS01967 were replaced with a new switch design in June, 1997 per Modification Request Form (MRF) 34428. This new design is expected to be more reliable than the previous switch design. The remainder of the Auxiliary Building Leak Detection level switches are scheduled to be replaced per MRF 34428 by December 31, 1997 to further enhance system reliability.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A change to SAP-1141 "Nonconformance Control Program," will clearly identify the need to track NCN dispositions which require corrective actions to ensure that they are field complete within 90 days of the disposition date or sent to Engineering for re-evaluation.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The change to SAP-1141 will be complete by October 1, 1997.