July 30, 1997

South Carolina Electric & Gas Company
ATTN: Mr. Gary J. Taylor
Vice President, Nuclear Operations
Virgil C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, SC 29065

SUBJECT: RESPONSE TO COMMENTS ON V. C. SUMMER SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT - INSPECTION REPORT NO. 50-395/96-99

Dear Mr. Taylor:

Thank you for your response dated February 12, 1997, and for your presentation in the NRC, Region II office on March 18, 1997, which provided your comments and views on the V. C. Summer SALP Report which was issued on December 6, 1996. Based on your input, the SALP Board reconvened on March 26, 1997, and reviewed the information that you provided.

In addition, the NRC also conducted an independent review of the SALP Report. After considerable deliberation, I have decided that, for the reasons presented in Enclosure 1 several changes to the SALP Report were appropriate. No change to the Plant Support Category Rating was required; however, the original report was modified after review by the independent panel. The associated revised SALP pages are included as Enclosure 2.

Should you have any questions concerning this matter, please contact Mr. A. Belisle at (404) 562-4550.

Sincerely,

Original signed by Luis A. Reyes

Luis A. Reyes
Regional Administrator

Docket No. 50-395
License No. NPF-12

Enclosures: 1. Evaluation and Conclusions
2. Revised SALP Pages

cc w/encls: See page 2

IE 40

cc w/encls:
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*See previous concurrence - attached

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NRC'S EVALUATIONS AND CONCLUSIONS ON SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S (SCE&G) RESPONSE TO THE V. C. SUMMER SALP REPORT

By letter dated February 12, 1997, SCE&G provided comments on the V. C. Summer SALP Report which was issued on December 6, 1996. The comments involved five areas that collectively comprise the Plant Support SALP functional area. The specific comments from SCE&G are in quotes.

1. NRC Evaluation of Comments on Radiological Control Improvements

"In the area of Radiological Controls, V. C. Summer has realized significant reductions in dose, plant effluents, and radwaste generation since the last SALP period. Radioactive material control performance and the number of NRC violations has remained constant when compared to the last assessment period. Improvements in the area have been made while at the same time drastically lowering our threshold for problem reporting. Radiological Controls improvements far outweigh any issues identified during this SALP period as supported by the following:"

SCE&G	NRC
"Annual exposure has been reduced from the previous assessment period, even if the dose from the 1994 steam generator replacement is excluded."	The lower radiation exposure was considered and recognized by the SALP Board.
"Outage dose in Refuel 9 was our lowest in history and 9th lowest refueling dose ever for PWRs."	
"Effectively reduced plant effluents, when compared to last SALP period."	The doses from effluents were recognized by the NRC as being significantly below regulatory limits.
"Greatly reduced the amount of contaminated trash generated annually."	Reduction of radiological radwaste and the amount of contaminated area were considered by the SALP Board
"Contaminated surface area within the radiation control area (RCA) is maintained less than 2%."	
"During refueling outages, the containment building is maintained accessible in street clothes."	This information was discussed at the SALP Board.
"V. C. Summer Nuclear Station [VCSNS] is recognized within the industry by INPO and our peers for our contamination control."	No information was available to confirm or deny this statement.

ENCLOSURE 1

"NRC Inspection Reports have also included remarks complimentary of contamination control. (94-15, 95-03, & 95-19)"	The inspection history was considered by the SALP Board.
"The number of NRC violations in Radiological Controls is consistent with the previous SALP period."	SALP assessments are not a direct function of the number of violations. Enforcement history was considered by the SALP Board.
"Incidents of radioactive material discovered outside of the RCA has remained constant when compared to the last SALP period. There has been no instance of loss of contamination control from the protected area."	The information regarding contamination events during this assessment period was considered by the SALP Board; the write up was changed to reflect the results of the independent review.
"A review of Region II SALP history indicates other plants with recent incidents of contamination control issues who subsequently received a superior rating in Plant Support."	The SALP Board reviewed V. C. Summer's performance in accordance with NRC's criteria and not in comparison with other sites.

Changes were made to the SALP Report in the Radiological Control area. The statement involving the site ALARA program was modified to read:

> The site ALARA program was effective in maintaining low site collective dose.

The statements involving contamination control were modified to read:

> Personnel contamination control measures were generally successful throughout the period. There were some examples where control of contamination was lost, in that, contamination and contaminated material were found outside control boundaries.

2. NRC Evaluation of Comments on Emergency Preparedness

> "Emergency Preparedness at V. C. Summer has made improvements in the areas of Emergency Response Organization (ERO) staffing, computerized information exchange & status, accountability of non-essential personnel, and siren availability. We have continued to receive positive feedback due to our close working relationship with state and local governments within our EPZ, and our annual evaluated exercise results showed improvements. Our continuous improvements in light of the lowered threshold for problem reporting, discussed earlier, far outweigh any issues raised during the SALP period as supported by the following:"

SCE&G	NRC
"The ERO was placed in a four team rotation, this has allowed for more effective table top drills, improved accountability and improved teamwork."	This is new information. It was not independently verified during the SALP period.
"Developed a computerized Emergency Information System (EIS) to enhance information exchange between the facilities."	
"Installation of the biometrics hand geometry system has decreased the time required to conduct accountability."	This is new information. It was not independently verified in Emergency Preparedness during the SALP period. Credit was noted for the biometric hand geometry system in the security area.
"VCSNS has been recognized by the state for taking the lead role with South Carolina utilities in the effort to replace the State's emergency radiac and dosimetry inventory. This action was in response to notification that FEMA would no longer fund the Radiological Defense Program."	This was not inspected during the SALP period.
"Siren performance has made steady improvement compared to the last SALP period. In 1996 VCSNS achieved an unprecedented average operability of 98.10% with a complete cycle test with 99.06% of sirens sounding."	Management support for the Early Warning System (EWS) and telephone system was considered by the SALP Board.
"Training drills are conducted with interim Emergency Directors and licensed operators during each licensed operator training cycle. These drills have been diverse and challenging to ensure each shift's emergency classification ability."	The fundamental initiator for each of the training drills for the four months preceding the exercise, which is the evaluated event, appeared to be the same as for each exercise. A drill history with a spectrum of initiators, coupled with an exercise with a unique initiator, would have demonstrated a challenge to the integrated emergency response organization.

Changes were made to the SALP Report in the Emergency Preparedness area. The following statements were deleted:

However, actual response indicated some decline in performance.

.. and in maintaining awareness of siren system status in order to make timely reports.

Several improvements were made to .... to make them more reliable.

The statement involving the Alert and Notification System was modified to read:

The Alert and Notification System sirens had been effectively maintained.

No changes were appropriate for issues involving the four team notation, the computerized information system, and taking the lead note with South Carolina.

3. NRC Evaluation of Comments on Fire Protection

"The number of violations and negative comments contained in inspection reports has significantly decreased this SALP period despite the fact that we have replaced the fire detection system, rerouted sprinkler systems, and rewritten our fire implementation procedures. An NRC inspection, conducted in October to assess performance for the entire SALP assessment period, was overall complimentary with only minor discrepancies noted. Our new fire protection team approach is committed to continuous improvement and problem solving to meet rising expectations and maintain a superior level of performance as evidenced by:"

SCE&G	NRC
"The number of violations and negative comments contained in inspection reports has significantly decreased this SALP period."	The inspection and enforcement performance was considered by the SALP Board.
"Replaced the fire detection computer system with a new enhanced state-of-the-art Simplex fire detection system."	The installation of this system was in process at the time of the fire protection inspection in October 1996. The estimated installation completion was scheduled for late 1996. This new system was considered by the SALP Board.
"Performed a job task analysis for personnel performing fire protection duties."	This item was not inspected.

"Formed a fire protection team (consisting of a System Engineer, Design Engineer, Test Specialist, I&C Technician, Fire Protection Supervisor, a Licensing Representative and other plant representatives as deemed necessary) which meets monthly to discuss fire protection issues."	This item was considered by the Special Inspection Branch and SALP Board.
"Changed personnel responsible for oversight of the Fire Protection program."	This item was considered by the Special Inspection Branch and SALP Board.
"Revised the Fire Protection Procedures to improve quality and efficiency."	This item was considered by the Special Inspection Branch and SALP Board.
"Conducted a performance based engineering evaluation of the fire protection program and revised the testing program to incorporate the evaluation findings. This evaluation allowed the extension of some testing frequencies based on historical equipment performance and system reliability."	This item was not inspected.

Changes were made to the SALP Report in the fire protection area to reflect noted improvement in performance during the last six months of the assessment period. The statement involving Fire Protection program implementation was modified to read:

> The Fire Protection program implementation was satisfactory early in the assessment period and improved to good by the end of this period.

This statement addresses the new fire detection system.

The statement involving organization and staffing changes was modified to read:

> Organization and staffing changes were made late in the period in an effort to improve performance and some improvement was evident.

This statement addresses the fire protection team and changes in personnel oversight.

The statement involving housekeeping was modified to read:

> Housekeeping, in general, was very good.

A review of fire protection procedures identified that the procedures were adequate. No change was appropriate to the SALP Report for procedure issues related to the job task analysis and performance based engineering evaluation.

4. NRC Evaluation of Comments on Chemistry

"Performance within the chemistry area continues to be maintained at a superior level and SCE&G continues to make program enhancements as illustrated by the following:"

SCE&G	NRC
"Developed a program to incorporate a secondary plant auxiliary system corrosion monitoring system."	No independent NRC verification was conducted on the program to incorporate a secondary plant auxiliary system corrosion monitoring system.
"Achieved the INPO Chemistry Index Performance Goal of <1.20 for the year."	
"Met a challenging goal to maintain Lithium and Boron concentrations to help ensure low exposure rates during the refueling outage and during the operating cycle."	
"Developed a program to convert to 3-methhoxpropylamine (MPA) secondary plant chemistry control."	

No changes were made to the SALP report in the chemistry area.

5. NRC Evaluation of Comments on Security

"Superior performance has been maintained within the area of Security, and SCE&G continues to make program enhancements as evidenced by the following:"

SCE&G	NRC
"Installed the biometrics hand geometry system."	This was recognized by the SALP Board.
"Installed the vehicle barrier system."	This was not inspected during the SALP period.
"Upgraded Perimeter Intrusion Detection System."	This was recognized by the SALP Board.
"Converted to the I Star badging system."	This was recognized by the SALP Board.
"Developed program to incorporate NEI's Personnel Access Data System."	This was not inspected during the SALP period.

No changes were made to the SALP report in the security area. The statement, "the protected area access control equipment was reliable and effective." includes inspection of biometrics, perimeter intrusion and badging.

Conclusion:

Based on our review of your response and the information provided by you during the March 18, 1997 meeting, we have concluded that, based on the inspections that were performed during the SALP period, your attention and involvement were normally well focused and resulted in a good level of safety performance. In addition, your programs and procedures normally provided the necessary control of activities but some deficiencies existed.

The SALP Board recommended no changes to the Category rating.

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SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
(INSPECTION REPORT NO. 50-395/96-99)

Dear Mr. Taylor:

The U.S. Nuclear Regulatory Commission (NRC) has completed the Systematic Assessment of Licensee Performance (SALP) for the Summer Nuclear Plant. The facility was assessed in four functional areas for the period of January 29, 1995, through October 26, 1996. The results of the assessment are documented in the enclosed SALP report which will be discussed with you at a public meeting at the Summer site on December 16, 1996, at 1:00 p.m.

Summer Nuclear Plant performance was assessed in four functional areas: Plant Operations, Maintenance, Engineering, and Plant Support. Performance in Operations and Maintenance remained superior. Performance in Engineering improved and is now considered superior. Performance in Plant Support was good.

Plant Operations superior performance was characterized by stable power operations, strong operator knowledge and ability, and effective management self-assessment activities. Superior performance in Maintenance was sustained by strong management support, a firm commitment to inspection and testing programs and well trained and knowledgeable personnel. Engineering achieved superior performance due to an improved design control process, strong maintenance of the licensing basis, and effective support to other organizations. Plant Support performance was generally good with some examples where deficiencies existed.

Initiatives that contributed to superior performance in the majority of functional areas were strong management support for benchmarking and self-assessment activities including auditing and rotations of personnel. This included both staff and management in order to improve station self-assessment and quality verification activities.

In accordance with Section 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Enclosure 2

V. PLANT SUPPORT

This functional area addresses all activities related to the plant support function, including radiological controls, radioactive effluents, chemistry, emergency preparedness, security, fire protection, and housekeeping.

The radiological control program was effective in protecting the health and safety of plant workers and members of the public. The onsite radiation protection program controlled internal and external radiation exposures below regulatory limits. The site ALARA program was effective in maintaining low site collective dose. Personnel contamination control measures were generally successful throughout the period. There were some examples where control of contamination was lost, in that, contamination and contaminated material were found outside control boundaries.

Offsite radiation exposure to members of the public was substantially below regulatory limits. The environmental monitoring program confirmed effective effluent controls in that only trace amounts of radioactivity were detected in the environs of the plant.

Effective chemistry programs were implemented to inhibit degradation due to corrosion of components in both primary and secondary systems. The program for handling, packaging and transport of radioactive materials functioned very well.

The emergency preparedness program was generally effective in maintaining site readiness to respond to emergencies. A challenge was noted in developing challenging emergency exercise scenarios. The Alert and Notification System sirens had been effectively maintained. Preparations for a hurricane minimized the risks and potential damage to plant facilities from rain and high winds.

The licensee continued to implement and support the Physical Security Plan, procedures and associated programs in an outstanding manner. The security program was strong and well managed. The protected area access control equipment was reliable and effective. Station management was active in identifying and correcting potential problems.

The Fire Protection program implementation was satisfactory early in the assessment period and improved to good by the end of this period. Early in the period, a number of human performance errors existed, but a marked improvement was noted in the implementation of the program at the end of the period. Maintenance and testing of fire protection systems were good with a significant reduction in the backlog of fire protection related maintenance items. Organization and staffing changes were made late in the assessment and improved performance was evident. Quality assurance audits were thorough and corrective actions were timely. Housekeeping, in general, was very good.

The Plant Support area is rated Category 2.