

ENCLOSURE 1

NOTICE OF VIOLATION

South Carolina Electric and Gas Company
V. C. Summer

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on January 11-15, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. 10 CFR 50.49(d)(1) and (2) requires, in part, that environmental qualification (EQ) file for electrical equipment include the electrical characteristics to ensure performance of equipment operation under conditions existing during and following a design basis accident and 10 CFR 50.49(j) requires that a record of such be maintained in an auditable form.

Contrary to the above, the insulation resistance (IR) values used for Conax and D. G. O'Brien electrical penetration assemblies to determine performance characteristics were not adequately addressed in EQ file.

This is a Severity Level IV violation (Supplement I).

- B. 10 CFR 50, Appendix B, Criterion XI, Test Control, states that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures.

Contrary to the above, EQ maintenance requirements for the lubrication of Emergency Feed Water Pump were missed for two consecutive periods. The requirement was to lubricate the motor every twelve months as specified in EQF-M01-G03-0682. The motor was lubricated in October 1985, December 1986, and had not been lubricated as of January 15, 1988, thus exceeding the twelve month requirement for the last two periods.

This is a Severity Level V violation (Supplement I).

- C. 10 CFR 50.49(f) and (k) respectively require, in part, that (1) each item of electric equipment important to safety shall be qualified by testing of, or experience with identical or similar equipment, and the qualification shall include a supporting analysis to show that the equipment to be qualified is acceptable; and (2) electric equipment important to safety which was previously qualified in accordance with "Guidelines for Evaluating Environmental Reactors" dated November 1979 (DOR Guidelines) need not be requalified to 10 CFR 50.49. DOR Guidelines, Section 5.2.2, allows the use of type tests to qualify equipment important to safety if the equipment is identical in design and material construction to the test specimen.


Contrary to the above, at the time of the inspection, qualification package EQF-LUZ-G13-1282, Lubricants-Grease, did not contain the required similarity analysis necessary to qualify lubricants other than the tested Gulf products for use in EQ applications.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, South Carolina Electric and Gas Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, V. C. Summer, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

FOR THE NUCLEAR REGULATORY COMMISSION


Alan R. Herdt, Chief
Engineering Branch
Division of Reactor Safety

Dated at Atlanta, Georgia
this 2nd day of *May* 1988