



South Carolina Electric & Gas Company
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10CFR2.201

Ollie S. Bradham
Vice President
Nuclear Operations

August 26, 1988

88 AUG 30 P 1: 56

Dr. J. Nelson Grace
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 200
101 Marietta Street
Atlanta, Georgia

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation and
Deviation
NRC Inspection Report 88-15

Dear Dr. Grace:

Enclosed is the South Carolina Electric & Gas Company (SCE&G) response to the violation and deviation addressed in Enclosures 1 and 2 of NRC Inspection Report 50-395/88-15. SCE&G is in agreement with the alleged violation and deviation, and the enclosed response addresses the reasons for the violation and deviation, and corrective actions taken to prevent recurrence.

If you should have any questions, please advise.

Very truly yours,


O. S. Bradham

HID:OSB/bgh
Enclosures

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ENCLOSURE I

RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/88-15-03

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric & Gas Company (SCE&G) is in agreement with the alleged violation.

II. REASON FOR THE VIOLATION

A temporary modification, initiated under a previous Modification Request Form (MRF) program, was performed to remove the screen wash pump due to pump failure and to allow utilization of the Service Water pump discharge pressure to supply water for screen washing. It was determined that removal of the pump and the electrical control functions did not affect the safety system; however, it resulted in a stalled screen indication and also required manual washing of the screens. Since the modification was temporary, Operations personnel considered the manual washing to be only temporary and within the normal shift routine of the operator. For this reason, procedures were not revised to reflect the manual washing of the screens.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The System Operating Procedure (SOP-117) has been changed to reflect the current switch alignment for the 'A' Service Water (SW) Screen System. In addition, Special Instruction (SI 88-03) was changed to require the Intermediate Building Auxiliary Operator to perform a manual wash of the 'A' SW Screen each shift during rounds for Technical Specification Logs.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The present MRF program requires formal instructions, procedures and documentation when Engineered Safety Features or other equipment, governed by Technical Specifications, is modified under a temporary or permanent MRF. Specifically, this program requires that a checklist be utilized to ensure procedures are addressed/revised as necessary, and the required training is conducted.

V. DATE OF FULL COMPLIANCE

Corrective steps were completed on August 16, 1988.

ENCLOSURE II
RESPONSE TO NOTICE OF DEVIATION
DEVIATION NUMBER 50-395/88-15-02

I. ADMISSION OR DENIAL OF THE ALLEGED DEVIATION

South Carolina Electric & Gas Company (SCE&G) is in agreement with the alleged deviation.

II. REASON FOR THE DEVIATION

The air flow for emergency operation was an arbitrary selection to support preliminary design and PSAR preparation. The value of 61,500 cfm was half of the normal high speed flow rate of 123,000 cfm. Once the equipment was purchased, the actual flow rate established by the vendor was 60,270 cfm. In addition, the final containment analysis only used Reactor Building Cooling Unit (RBCU) heat removal capability and not air flow rates; thus the original air flow values were not changed or deleted. The off-site dose effects were analyzed utilizing the 60,270 cfm value (Ref. FSAR Table 15.4-15). When Standardized Technical Specifications were being prepared, analyzed numbers were used; however, the tolerance values of plus or minus ten percent in the Technical Specifications were inadvertently omitted from the analysis.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Upon identification of the discrepancy, an evaluation of the condition commenced and subsequent initiation of an off-normal occurrence was developed with the following concurrent actions:

- Declaration of both trains of RBCUs inoperable (entry into action statement)
- Immediate monitoring of Reactor Building Spray to ensure operability of both trains
- Immediate re-analysis of containment (cooling) and dose effects (initial calculations to be followed by detailed computer analysis)

The initial re-analysis utilized conservative assumptions to ensure compliance with 10CFR100 guidelines. Cooling capacity was virtually unaffected by varying the air flow rate from 60,270 CFM to 54,200 CFM. However, the dose rates were affected by the reduced air flows. Initial hand calculations yielded increases in dose rates due to reduced filtration, but still within 10CFR100 requirements. Based on these calculations, the RBCUs were returned to service. The subsequent computer dose analysis results were almost identical (fractional increase) to the initial FSAR analysis dose rates.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER DEVIATIONS

SCE&G currently has several programs in place and in development which will aid in precluding deviations of this nature. These programs include:

- Design Basis Documents Preparation.
- Safety System Functional Inspection performed by the Independent Safety Engineering Group.

Reviews performed under these programs are of a continuous nature. As discrepancies are found, they are evaluated and/or corrected on a case by case basis. In addition, SCE&G has initiated a review of Technical Specifications surveillance values utilizing similar tolerances. Verification will be performed to ensure Technical Specification values are bounded by analysis.

V. DATE OF FULL COMPLIANCE

Review of the Technical Specification surveillance values and revision of the FSAR is scheduled to be completed by March 31, 1989.

AS-BUILT DESIGN

Comment: It is not clear whether an adequate number of as-built anchors are being verified as required by NRC IEB 79-14, given the fact that some discrepancies had already been observed as part of the as-built verification (e.g., missing members).

Response: All of the anchors in the assessment program, (original as well as the added cope anchors) are being walked down for configuration deviations.