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APR 15 1986

Docket No. 50-395
License No. NPF-12
EA 86-45

South Carolina Electric and Gas Company
ATTN: Mr. D. A. Nauman, Vice President
Nuclear Operations
P. O. Box 764 (167)
Columbia, SC 29218

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
(NRC INSPECTION REPORT NO. 50-395/86-06)

An NRC inspection was conducted on February 1-28, 1986, of activities authorized by NRC Operating License No. NPF-12 for the V. C. Summer facility. The inspection included a review of operational safety verifications and certain operating events. As a result of this inspection, failures to comply with NRC regulatory requirements were identified. The findings were discussed at a March 4, 1986 exit meeting with members of your staff identified in the referenced inspection report and at an Enforcement Conference held in the NRC Region II Office on February 28, 1986.

Items I.A, I.B, and I.C described in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty involve your failure to comply with technical specifications in that one of two independent component cooling water (CCW) and service water (SW) loops were inoperable in excess of 72 hours while in Modes 1, 2, 3, or 4 without the plant being put in hot standby within the next 6 hours. In fact, the loops were inoperable for approximately 100 hours without the action statements being satisfied.

From January 30, 1986 until February 3, 1986, the B component cooling water loop was inoperable due to an incorrect electrical breaker alignment for the B and C component cooling water pumps. This rendered the B and C pumps incapable of an automatic start due to a safety injection signal. However, both pumps still had manual start capability from the main control board. In fact, as a result of a safety injection signal that occurred on February 3, 1986, the B CCW pump had to be manually started to respond to a safety injection signal.

From January 30, 1986 until February 3, 1986, the B loop of the service water system which uses the B or C SW pumps was also inoperable. During this period, the C pump, aligned to the B loop, ran continuously for approximately 100 hours even though post maintenance testing had not been completed. Therefore, this pump was technically inoperable. Under the system design, if a safety injection signal had occurred, the B SW pump would not have started automatically because of the electrical alignment required for the operating C pump.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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Violation I.D addresses System Operating Procedures SOP-117 and SOP-118 for the SW and CCW systems respectively, which were deficient in that they did not adequately address the correct electrical alignment of the swing pump for an idle loop. The problem was further complicated for the SW system because shift reviews of the removal and restoration (R&R) log, as required by Administrative Procedure SAP-200 (Conduct of Operations), were deficient in that the personnel did not recognize that the C Service Water Pump, logged out-of-service in the R&R, was actually operating.

To emphasize the importance of insuring that plant procedures contain adequate operating instructions for plant systems and that plant staff is aware of the status of systems, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000) for the violations in Item I as described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985) (Enforcement Policy), the violations described in Item I of the enclosed Notice have been categorized as a Severity Level III problem. The base value of a civil penalty for a Severity Level III violation or problem is \$50,000. I considered the escalation and mitigation factors allowed by the Enforcement Policy. While I recognize that you took prompt and extensive corrective actions, mitigation of the civil penalty would not be appropriate in this case because of your prior poor performance in the area of concern.

Item II discussed in the enclosed Notice involves the licensee's failure to maintain an hourly fire watch which was required by technical specifications because of an inoperable fire barrier. No civil penalty is proposed for this Severity Level IV violation.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions, the NRC will determine whether further enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in NRC's Public Document Room.

The response directed by this letter and the enclosure are not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

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Should you have any questions concerning this letter, please contact us.

Sincerely,

Original Signed by
Roger D. Walker /for

J. Nelson Grace
Regional Administrator

Enclosures:

1. Notice of Violation and
Proposed Imposition of
Civil Penalty
2. Inspection Report No. 50-395/86-06

cc w/encls:

- ✓ O. S. Bradham, Director, Nuclear Plant
Operations
- ✓ J. L. Skolds, Deputy Director
Operations and Maintenance
- ✓ J. B. Knotts, Jr.
Debevoise and Liberman
- ✓ W. A. Williams, Jr., Special
Assistant, Nuclear Operations -
Santee Cooper
- ✓ A. M. Paglia, Jr., Manager
Nuclear Licensing