

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

South Carolina Electric & Gas
V. C. Summer

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

During a Nuclear Regulatory Commission (NRC) inspection conducted on February 1-28, 1986, 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 (1985), the Nuclear Regulatory Commission proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act, as amended, ("Act"), 42 U.S.C 2282, PL 86-295, and 10 CFR 2.205. The particular violations and associated civil penalty are set forth below:

I. Violations Assessed a Civil Penalty

- A. Technical Specification 3.7.3 requires that two independent component cooling water (CCW) loops be operable in Modes 1, 2, 3 and 4. The action statement states that with one loop inoperable, restore at least two loops to operable status within 72 hours or be in at least hot standby within the next six hours and cold shutdown within the following 30 hours.

Contrary to the above, an incorrect breaker alignment rendered loop B of the component water cooling water system inoperable from January 30, 1986 until February 3, 1986. The loop was inoperable for approximately 100 hours while the reactor was in Modes 1, 2, 3, or 4.

- B. Technical Specification 3.7.4 requires that two independent service water (SW) loops be operable in Modes 1, 2, 3, and 4. The action statement states that with one loop inoperable, restore at least two loops to operable status within 72 hours or be in at least hot standby within the next six hours and cold shutdown with the following 30 hours.

Contrary to the above, loop B of the service water system was technically inoperable from January 30, 1986 until February 3, 1986 for a period of approximately 100 hours because post maintenance testing had not been completed on pump C, which was aligned to and supplying service water to this loop. Under the system design, pump B was incapable of starting automatically upon a safety injection signal because of the electrical alignment required for the operating C pump.

- C. Technical Specification 6.8.1 requires that the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978, be established and implemented. Appendix A of Regulatory Guide 1.33 states that safety-related system procedures should include instructions for startup, shutdown, and changing modes of operation as appropriate. System Operating Procedure (SOP) 117 for the service water system and SOP 118 for the component cooling water system implement this requirement.

Contrary to the above, as of February 3, 1986, SOP 117 and SOP 118 did not provide adequate instructions for the startup and shutdown of the CCW and SW systems in that they did not specify the correct electrical alignment for the swing pump under each possible operating configuration.

- D. Technical Specification 6.8.1 requires that the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978, be established and implemented. Appendix A of Regulatory Guide 1.33 states that safety-related system procedures should include instructions for startup, shutdown, and changing modes of operation as appropriate. Station Administrative Procedure SAP 200, Conduct of Operations, requires that the Shift Supervisor, Control Room Supervisor and Reactor Operator review the Removal and Restoration (R&R) log and be aware of the status of plant systems.

Contrary to the above, even though the R&R log was reviewed by the Shift Supervisor, the Control Room Supervisor, and the Reactor Operator between January 30, 1986 and February 3, 1986, they were not aware of the status of the "C" service water pump (i.e., the pump had been running without being declared operable) until notified by the NRC Inspector on February 3, 1986.

These violations have been categorized in the aggregate as a Severity Level III problem (Supplement I).

(Cumulative Civil Penalty - \$50,000 assessed equally between the violations.)

II. Violation Not Assessed a Civil Penalty

Technical Specification 3.7.10 requires that fire barrier assemblies separating safety-related fire areas or separating portions of redundant systems important to safe shutdown within a fire area and all sealing devices in fire rated assembly penetrations shall be operable. The action statement permits operation with an inoperable fire barrier provided the operability of the fire detectors on at least one side of the barrier is verified and an hourly fire watch patrol is established. These requirements are implemented in Operations Standing Instructions SI 86-03, Hourly Fire Watch Patrol.

Contrary to the above, on February 20, 1986, while a fire barrier was inoperable, an error in log keeping and review resulted in the deletion of the hourly fire watch patrol for Auxiliary Building Room AB 12-07 from 11:00 a.m. on February 20, 1986 until the error was detected at 12:00 p.m. on February 22, 1986, a period of approximately 47 hours.

This is a Severity Level IV violation (Supplement 1).

Pursuant to 10 CFR 2.201, South Carolina Electric and Gas Company is hereby required to submit to the Director, Office of Inspection and Enforcement, USNRC, Washington, D.C. 20555, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region II, 101 Marietta Street, N.W., Suite 2900, Atlanta, Georgia 30323, within 30 days of the date of this Notice a written statement or explanation including for each alleged violation: (1) admission or denial of the

alleged violation, (2) the reasons 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 violation, and (5) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Director, Office of Inspection and Enforcement, may issue an order 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. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, South Carolina Electric and Gas Company may pay the civil penalty by letter addressed to the Director, Office of Inspection and Enforcement, with a check, draft, or money order payable to the Treasurer of the United States in the amount of Fifty Thousand Dollars (\$50,000) or may protest imposition of the civil penalty in whole or in part by a written answer addressed to the Director, Office of Inspection and Enforcement. Should South Carolina Electric and Gas Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement will issue an order imposing the civil penalty in the amount proposed above. Should South Carolina Electric and Gas Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, such answer may: (1) deny the violations listed in this Notice in whole or in part, (2) demonstrate extenuating circumstances, (3) show error in this Notice, or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the five factors addressed in Section V.B of 10 CFR Part 2, Appendix C, should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201 but may incorporate by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of South Carolina Electric and Gas Company is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay the penalty due, which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by
Roger D. Walker /for

J. Nelson Grace
Regional Administrator

Dated at Atlanta, Georgia
this 15 day of April 1986

APR 15 1986

South Carolina Electric and Gas Company - 4 -

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