

NOTICE OF VIOLATION

South Carolina Electric & Gas Company
V. C. Summer Nuclear Station

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

During an NRC inspection conducted on November 30, 1997 through January 10, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 9 of Appendix A states that the licensee should have instructions for performing maintenance.

Station Administrative Procedure (SAP)-300, "Conduct of Maintenance," Revision 8, Paragraph 6.11.2.D states, "Procedure use and adherence is to be performed in accordance with SAP-123". Paragraph 6.2.9 of SAP-123, "Procedure Use and Adherence," Revision 2, states, in part, that procedure steps that have sign-offs shall be signed off at the completion of each step.

Paragraph 6.2.6.A of SAP-300, requires that the storage requirements of materials controlled by the Equipment Hold Tag shall be compatible with SAP-142. Paragraph 6.10.1.B.8.h of SAP-142, "Station Housekeeping Program," Revision 12, requires that components on wheels being stored in the vicinity of safety/quality related equipment shall have at least two wheels locked or comply with the specified restraint criteria.

Contrary to the above,

1. On December 9, 1997, the licensee failed to sign off applicable steps of Mechanical Maintenance Procedure (MMP)-300.033, "Changing Oil in Pumps Equipped with Trico Opti-Matic Oilers," Revision 2, at the completion of each step. Mechanical maintenance technicians completed checking oil level in the inboard and outboard bearings of the "A" Motor Driven Emergency Feedwater Pump but failed to sign off the applicable steps on Attachment I of MMP-300.033 at the completion of each step.
2. As of December 17, 1997, the licensee failed to lock at least two wheels or to comply with the specified restraint criteria for a component on wheels which was stored in the vicinity of safety/quality related equipment. A portable air monitor, mounted on wheels and not restrained, was observed near safety-related equipment on the 463 foot level of the Fuel Handling Building.

This is a severity level IV violation (Supplement I).

Enclosure 1

- B. 10 CFR 50.59, "Changes, tests and experiments." Paragraph (a)(1), states, in part, that the holder of a license authorizing operation of a production or utilization facility may make changes in the facility as described in the safety analysis report, without prior Commission approval, unless the proposed change involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question.

10 CFR 50.59, "Changes, tests and experiments," Paragraph (b)(1), states, in part, that the licensee shall maintain records of changes in the facility made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change, test, or experiment does not involve an unreviewed safety question.

Final Safety Analysis Report (FSAR) Section 9.5.1.1, "Design Basis," states that the fire protection systems are also addressed in the Fire Protection Evaluation Report (FPER), which is considered a part of this FSAR.

FPER Section 3.3.3, "Indication of Natural Circulation Cooling," states, in part, that the Control Room Evacuation Panel (CREP) provides indicators, which are independent of the control building, for hot leg and cold leg temperature for all three steam generator loops.

Contrary to the above, on November 19, 1997, the licensee failed to perform a written safety evaluation for a modification to the reactor coolant system, Loop "B" hot leg wide range temperature indication instrument on the CREP, and failed to provide the bases for the determination that this modification did not involve an unreviewed safety question. This modification represented a change to the facility as described in the safety analysis report in that the temperature indication was no longer independent of the control building as described in the FPER.

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

Pursuant to the provisions of 10 CFR 2.201, South Carolina Electric & Gas Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the V. C. Summer Nuclear Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within

the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 9th day of February 1998