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September 18, 1997
RC-97-0190

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 97-07

Attached is the South Carolina Electric & Gas (SCE&G) response to the Notice of Violations delineated in the NRC Inspection Report No. 50-395/97-07. SCE&G is in agreement with the violations, and the enclosed response addresses the reasons and corrective actions being taken to prevent recurrence.

Should you have any questions, please call at your convenience.

Very truly yours,

Gary J. Taylor

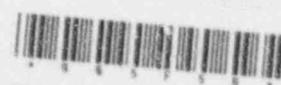
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RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/97007-01 (A)
NUMBER 50-395/97007-02 (B)

I. RESTATEMENT OF NRC VIOLATIONS

- A. Technical Specification (TS) 3.6.4, "Containment Isolation Valves," requires that each containment isolation valve shall be operable and that locked or sealed closed valves may be opened on an intermittent basis under administrative control.

Contrary to the above, on June 20, 1997, train A hydrogen monitor containment isolation valves, SVX-6051A, SVX-6052A, and SVX-6053A, were opened on an intermittent basis to perform a hydrogen monitor calibration without establishing administrative controls.

- B. 10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, States, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Contrary to the above, on July 10, 1997, the licensee failed to prescribe documented procedures of a type appropriate to the circumstances. Established procedures did not contain appropriate instructions for the installation of Grinnel pipe restraints on safety-related systems.

II. STATEMENT OF POSITION

South Carolina Electric and Gas Company (SCE&G) is in agreement with the violations as stated above.

III. REASON FOR THE VIOLATIONS

- A. The cause of this event is attributed to a procedural deficiency. STP-301.004, "Train A Containment Hydrogen Monitor Calibration," Revision 2, did not specify that the opening of the isolation valves during performance of the calibration should be accomplished only with appropriate administrative controls during plant operations to maintain the operability of the containment isolation valves.
- B. The cause of this event is attributed to human performance errors, in that the engineer revising the type of restraint called for by the MRF performed an inadequate review of the change, and, the technicians performing the installation failed to correct the procedure inconsistencies prior to performance of the installation.

Inconsistency between steps in the body of procedure MMP-305.004 and the sign-off steps in the procedure data sheet existed. The procedure data sheet did not require that the strut movement tolerance measurements specified in step 7.12.8.C be documented. It was determined that the step had been completed but not specifically documented. An engineering review of the step determined that documentation was not necessary based on other verifications performed in the procedure.

A further review of the procedure and other completed work documentation identified that MMP-305.004 had not been adequately revised to reflect specific installation requirements for Grinnel type restraints. The original modification package had been prepared using Bergen Paterson restraints. The MRF was later revised to use Grinnel restraints. A review of the procedure had not been performed to ensure that the different installation requirements were included in the procedure. The procedural discrepancies identified included: Step 7.12.9 of MMP-305.004 required verification of less than a four degree angular tolerance between structural attachment and the pipe attachment. The MRF for the Grinnel restraints required a maximum three degree angular tolerance.

IV. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

- A. An internal Operations memorandum was issued to direct operators to ensure the hydrogen monitor containment isolation valves (CIVs) remain closed pending a review of this event.
- B. Upon identification of this event, all work on the snubber replacement project was immediately stopped until the hardware and procedural issues were resolved.

It was verified that the two Grinnel restraints installed were installed correctly. Installation procedure MMP-305.004 was revised to reflect the MRF requirements for the Grinnel type restraints.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

- A. STP-301.004, "Train A Containment Hydrogen Monitor Calibration" and STP-301.005, "Train B Containment Hydrogen Monitor Calibration" have been revised to specify that the calibrations be performed only in mode 5 (Cold Shutdown) or mode 6 (Refueling). Technical Specification 3.6.4 is not applicable in these modes.
- B. Quality Control and Maintenance personnel were provided additional training on the implementation of the MRF and associated procedures.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G considers itself to be in full compliance at this time.