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RC-98-0044

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  
REPLY TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT 97-14

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Notice of Violation delineated in NRC Inspection Report No. 50-395/97-14. 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

sbr  
Attachments

c:	J. L. Skolds	R. R. Mahan (w/o Attachment)
	L. A. Reyes	W. F. Conway
	L. M. Padovan	R. J. White
	NRC Resident Inspector	J. B. Knotts, Jr.
	M. F. Miltner	NSRC
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	Paulette Ledbetter	DMS (RC-98-0044)

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NUCLEAR EXCELLENCE - A SUMMER TRADITION!

ATTACHMENT I  
REPLY TO NOTICE OF VIOLATION "A"  
NUMBER 50-395/97014-01

I. RESTATEMENT OF NRC VIOLATION

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-off shall be signed off at the completion of each step.

Paragraph 6.9.6.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.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

1. Mechanical maintenance technicians were checking the oil level in the inboard and outboard bearings of the "A" Motor Driven Emergency Feedwater Pump per MMP 300.033. The procedure stated that the initial level should be checked and if found okay to be recorded as "AS FOUND DATA". The "AS LEFT DATA" should also be recorded. The technicians did find the oil level to be satisfactory, however they failed to sign off the applicable steps on Attachment I at the completion of each step as the procedure directed.

The violation was the result of failure to follow the procedure and a lack of utilization of the STAR (Stop, Think, Act and Review) principle.

2. It was determined that the portable air monitor was actually plant equipment that was intended to be used for post accident monitoring. The equipment was identified in the CHAMPS equipment system however, the equipment had not been used since the installation of the permanent post accident sample system. An equipment hold tag was on the equipment. The brakes on the equipment were engaged but were found to be defective.

The violation resulted from a lack of timeliness in identifying that the equipment was no longer needed and removing it from the area.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The violation and Management expectations for procedure use were discussed in shop meetings. A copy of the inspection report was placed in the Maintenance Department's required reading.
2. The portable air monitor was removed from the area.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

1. In March the plant will conduct a sitewide "STAR AWARENESS DAY" with the topic being procedure adherence.
2. SCE&G will perform a plant walkdown of wheeled components to identify and correct any similar violations of storage requirements. Decisions will be made as to the necessity for the components to have wheels or locks on wheels. Wheels will be checked, locked or removed.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance by April 1, 1998.

ATTACHMENT II  
REPLY TO NOTICE OF VIOLATION "B"  
NUMBER 97014-03

I. RESTATEMENT OF NRC VIOLATION

10 CFR 50.59, "Changes, test 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, test 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 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.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

A 50.59 screening and a review of the FPER for the modification was performed. During the reviews for the 50.59 screening, a letter to the NRC dated April 23, 1986, discussing the plant's Appendix R re-analysis was found. Contained in this analysis was a statement discussing the Control Room Evacuation Panel (CREP) and hot leg temperature indication. This modification package and the 50.59 screening adequately addressed this statement with respect to the temporary change being made to the plant. However, these reviews failed to identify that the referenced sentence was also contained in Section 3.3.3 of the FPER. If the sentence had been identified in the FPER, a full 50.59 evaluation would have been performed.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A revision was made to the 50.59 screening and the applicable question (i.e. change to the facility as described in the FSAR/FPER) was answered as "YES". A full 50.59 evaluation was performed and the above section of the FPER addressed in the evaluation. All questions on the full 50.59 evaluation were marked "NO". Therefore, this change did not involve an unreviewed safety question.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

This issue was discussed with the individuals involved in the 50.59 screening. Management expectations concerning the use of the new electronic document search tool, FOLIO, will be discussed with the Design Engineering staff by April 1, 1998.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance by April 1, 1998.