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April 24, 1989

89 APR 27 AIO: 01

Mr. S. D. Ebnetter
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
NRC Inspection Report 88-32
Licensee Comments

Dear Mr. Ebnetter:

The following comments are being submitted in accordance with your letter dated March 17, 1989:

1. Page 4, last paragraph, fourth sentence.

South Carolina Electric & Gas Company (SCE&G) knows of no specific case where procedures with known errors were required to be used. When problems were identified with procedures, actions were taken to correct the problem. Use of procedures with known errors has not been, nor is it now, an acceptable practice.

2. Page 8, fourth paragraph.

It is SCE&G's intent, and has always been its philosophy, to operate the plant by the consistent use of accurate procedures. The mistakes identified during the review period have been investigated and determined to not be technically significant. However, Operations will perform a walk-down of all safety related system lineups and correct any errors discovered between system operating procedures, surveillance procedures, CHAMPS nomenclature, and controlled systems drawings. This will require an extensive manpower effort to be continued through the next SALP period.

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3. Page 15, third paragraph, fourth sentence.

High quality maintenance is considered to be essential in order to maintain the plant in the best possible state based on resources available. A perceived weakness was addressed in the excessive time required to perform specific functions supported by the vendor. It is a normal process to use vendor estimates in developing an outage schedule. The vendor underestimated the difficulty in our process and SCE&G also experienced equipment malfunctions. The final observation, a lack of line supervisor involvement, is a concern for maintenance management. SCE&G has expressly encouraged the "supervision in the field" philosophy and believes that it is paramount to getting the job done right the first time. SCE&G will continue to stress this issue and remove the actual stumbling blocks that prevent this from happening.

4. Page 21, third paragraph, last sentence.

The number of Design Base Documents (DBD's) to be developed is approximately 40 instead of 50.

5. Page 22, third paragraph, last sentence.

The apparent weakness is in "getting the issue into the modification stage" and not in "engineering support."

6. Page 26, first paragraph, second sentence.

The second example described in this sentence relates to SCE&G's submittal for L*. The following is a more accurate description of the L* criteria than that provided in the draft report.

- 1) the defects are located more than .5 inch into the tubesheet,
- 2) the defects are oriented not greater than 30° from axial, and
- 3) a minimum of 1.3 inches of sound expanded tube exists in the top portion of the affected tube.

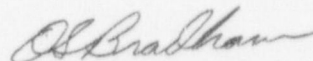
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7. Page 27, second paragraph, second sentence.

On September 29, 1988, SCE&G provided the initial response to NRCB 88-08. Prior to making the submittal, SCE&G requested a meeting with the NRC to discuss the proposed SCE&G plan for implementing the requirements of NRCB 88-08. On October 6, 1988, a meeting was held to explain in detail the methodology used to arrive at the proposed plan. At the meeting the NRC staff determined the program was acceptable for the present refueling outage; however, they requested that SCE&G submit additional information prior to restart. This submittal was made by SCE&G on December 19, 1988 (plant startup-December 29, 1988). Therefore, submittals pertaining to this bulletin were made within the requested time frames. The meeting held on October 6, 1988, was requested by SCE&G to fully explain the methodology used to address the bulletin requirements in an attempt to decrease the required effort and review time by the NRC. Every effort was made by SCE&G to reduce NRC staff effort necessary to obtain an acceptable program to address NRC Bulletin 88-08.

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

Very truly yours,



O. S. Bradham

EE/OSB:lcd

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