



South Carolina Electric & Gas Company
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 Nuclear Operations

August 31, 1989

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

SUBJECT: Virgil C. Summer Nuclear Station
 Docket No. 50/395
 Operating License No. NPF-12
 Response to Notice of Violation
 NRC Inspection Report 89-13

Gentlemen:

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the violation addressed in Enclosure 1 of NRC Inspection Report 50-395/89-13. SCE&G is in agreement with the alleged violation, and the enclosed response addresses the reason for the violation and the corrective actions being taken to prevent recurrence.

If you should have any questions, please advise.

Very truly yours,

O. S. Bradham

HID/OSB:lcd
 Attachment

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RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/89-13-01

I. ADMISSION OR DENIAL OF THE VIOLATION

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

II. REASON FOR THE VIOLATION

Procedures were inadequate in that an evaluation was not performed prior to installing two temporary demineralizers to permit draining of the steam generators. In addition, a work document was not initiated which would have required an evaluation, allowed tracking the installation, and insured removal prior to mode escalation.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Demineralizer units were removed on July 6, 1989. An Engineering evaluation was conducted to determine if the temporary demineralizers could have prevented the Service Water or Component Cooling Water Systems from performing their design basis function during a seismic event. It was determined that the condition did not place the plant outside the design basis or reduce the margin of safety.

IV. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

A Health Physics procedure is in development which will delineate the necessary requirements for installation/removal of portable or temporary demineralizers. In the interim, the established Removal and Restoration Program will be used to establish data and mode restraints to ensure that this equipment is removed, when required, prior to unit startup. In addition, plant procedures will be revised to ensure temporary equipment/scaffolding is removed, when required, prior to Mode 4.

V. DATE OF FULL COMPLIANCE

Procedure will be reviewed/approved by December 31, 1989.