



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931**

September 1, 2000

South Carolina Electric & Gas Company
ATTN: Mr. Stephen A. Byrne
Vice President, Nuclear Operations
Virgil C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, SC 29065

SUBJECT: ERRATA LETTER FOR NRC INSPECTION REPORT NO. 50-395/00-04

Dear Mr. Byrne:

By letter dated July 24, 2000, our latest inspection report for your Virgil C. Summer reactor facility was provided to you. We have determined that revisions of safeguards Sections 3PP1, 3PP2 and 3PP3 of the subject inspection report were not properly incorporated. We have discussed this matter with members of your staff and made the necessary changes to the subject inspection report. Accordingly, please replace the report cover page and effected pages 17, 18 and 22 of the subject inspection report with the ones enclosed.

I apologize for any inconvenience that this error may have caused. If you have any questions about this matter, please contact me at (404) 562-4550.

Sincerely,

/RA/

Robert C. Haag, Chief
Reactor Projects Branch 5
Division of Reactor Projects

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

Enclosure: Report cover page and pages 17, 18 and 22
of NRC Inspection Report No. 50-395/00-04

cc w/encl: (See page 2)

cc w/encl:

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

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

Report No.: 50-395/00-04

Licensee: South Carolina Electric & Gas (SCE&G)

Facility: Virgil C. Summer Nuclear Station

Location: P. O. Box 88
Jenkinsville, SC 29065

Dates: April 2 - June 24, 2000

Inspectors: M. Widmann, Senior Resident Inspector
M. King, Resident Inspector
L. Garner, Senior Project Engineer, RII (Portion of Section 1R07)
L. Hayes, Security Specialist, RII (Sections 3PP1 and 3PP2)
J. Kreh, Emergency Preparedness Specialist, RII (Sections 1EP2, 1EP3,
1EP4, 1EP5, 4OA1.3, 4OA1.4 and 4OA1.5)
G. Kuzo, Senior Radiation Specialist, RII (Sections 2PS1 and 2PS3)
T. Morrissey, Project Engineer, RII (Portions of Sections 1R04, 1R15,
R16 and 1R23 and Sections 4OA1.1, 4OA1.2, and 4OA5)

Approved by: R. C. Haag, Chief, Reactor Projects Branch 5
Division of Reactor Projects

Enclosure

the ODCM. Reviewed program areas included air sampling equipment calibrations, field sampling station equipment material condition and placement, 1999 REMP results, and inter-laboratory comparison results.

b. Issues and Findings

No findings were identified.

3. **SAFEGUARDS**

Cornerstone: Physical Protection

3PP1 Access Authorization

a. Inspection Scope

The inspector reviewed licensee procedures, Fitness For Duty (FFD) reports, and licensee audits. Additionally, the inspector interviewed representatives of licensee management and escort personnel concerning their understanding of the Behavior Observation portion of the personnel screening and FFD program. In interviewing these personnel the inspector reviewed the effectiveness of their training and abilities to recognize aberrant behavioral traits.

b. Issues and Findings

No findings were identified or documented regarding supervisors' or escorts' understanding of the Behavioral Observation portion of the FFD program.

Procedure FFD-100, Revision 5, implements the licensee's chemical testing program. Upon review, the inspector determined that Section 5.3.1, "For Cause Testing," requires mandatory for cause testing of an individual involved in an event that leads to radiation exposure or release of radioactivity in excess of regulatory limits if it was a result of a personnel error due to impaired performance. Upon further discussion with licensee representatives, the inspector determined that the licensee characterized impaired performance as reasonable suspicion that indicates possible substance abuse. Additionally, Section 5.3.2 only requires "mandatory consideration" of for cause testing for accidents with an injury, which involved a failure in individual performance (i.e., violation of procedure or industrial safety practices). The requirements of 10 CFR 26.24(a)(3) requires for cause testing after accidents involving a failure in individual performance resulting in personnel injury or a radiation exposure or release of radioactivity in excess of regulatory limits. The provisions of 10 CFR 26.24(a)(3) do not require suspicion of drug or alcohol use to for cause test after these types of accidents; only that there was a failure in individual performance.

The adequacy of the licensee's procedure which implements for cause testing of individuals involved with personnel performance accidents that lead to personnel injury, radiation exposure, or a release of radioactivity in excess of regulatory requirements is under NRC review. Also under review is the generic applicability of this issue.

Therefore, URI 50-395/00004-02 has been opened pending further NRC evaluation.

3PP2 Access Control

a. Inspection Scope

The inspector observed access control activities and equipment testing during the course of the inspection. In observing the access control activities, the inspector assessed whether officers could detect contraband before it was introduced into the protected area. Additionally, the inspector assessed whether the licensee was conducting access control equipment testing according to regulatory requirements through observation, review of procedures, and log entries.

b. Issues and Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

.1 Auxiliary Feedwater System (AFW) Performance Indicator (PI)

a. Inspection Scope

The inspectors verified the accuracy of the 1ST quarter 2000 PI for Safety System Unavailability for the AFW system. The inspectors reviewed selective samples of station logs, the licensee's 10 CFR 50.65 maintenance rule database, corrective action program database and restoration and removal logs for the period of January 1999 through March 2000.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Archie, Manager, Planning & Scheduling
 F. Bacon, Manager, Chemistry Services
 L. Blue, Manager, Health Physics and Radwaste
 M. Browne, Manager, Nuclear Licensing and Operating Experience
 R. Clary, Manager, Plant Life Extension
 C. Fields, Manager, Quality Systems
 M. Fowlkes, Manager, Operations
 L. Hipp, Manager, Nuclear Protection Services
 T. Keckeisen, Supervisor, Fire Protection
 G. Moffatt, Manager, Design Engineering
 K. Nettles, General Manager, Nuclear Support Services
 A. Rice, Manager, Plant Support Engineering
 B. Waselus, General Manager, Engineering Services (Interim)
 R. White, Nuclear Coordinator, South Carolina Public Service Authority
 B. Williams, General Manager, Nuclear Plant Operations
 G. Williams, Manager, Maintenance Services

NRC

Walt Rogers, Senior Reactor Analyst

ITEMS OPENED AND CLOSED

Opened

50-395/00004-01	URI	review licensee's evaluation of discrepancies between the spent fuel pool ventilation design basis document, technical specifications and surveillance test procedure (Section 1R04.2)
50-395/00004-02	URI	adequacy of procedure for mandatory for cause testing under review (Section 3PP1)

Open and Closed

50-395/99006-03	NCV	second example: failure to properly calibrate particulate and gaseous effluent discharge monitoring equipment in accordance with 10 CFR Part 20.1501(b) requirements (Section 2PS1)
2515/144	TI	Performance Indicator Data Collecting and Reporting Process Review (Section 4OA5.1)