

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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VICE PRESIDENT AND GROUP EXECUTIVE
SPECIAL SERVICES AND PURCHASING

August 31, 1979

United States Nuclear Regulatory Commission
ATTN: Mr. James P. O'Reilly
Director
Region II
101 Marietta Street, NW
Atlanta, Georgia 30303

Subject: V. C. Summer Nuclear Station
Unit #1
Reportable Items in Accordance
with 10CFR50.55(e)

Gentlemen:

On July 30, 1979, SCE&G identified to Region II concerns relative to deficient welding of pipe hangers and supports. In late November and early December 1978, SCE&G QA surveillance efforts identified welds that had been accepted by the constructor's inspection personnel. The problem was pursued via a QA program technique; a "Corrective Action Request" (CAR).

During the period from identification to notification, efforts were extended to determine the cause of the conditions, extent of the conditions, appropriate corrective actions, and establish through engineering evaluations whether the conditions constituted a significant deficiency in accordance with requirements of 10CFR50.55(e) had they gone uncorrected. Actions taken during this period have been examined by I & E personnel of Region II subsequent to the July 30th notification of this Potential Significant Deficiency.

The extent of the conditions were established utilizing a sampling re-inspection program to attempt to isolate deficient hardware as committed by the constructors QC discipline in response to the CAR. This sampling re-inspection established that all hangers and supports inspected and accepted prior to mid-March were suspected, and would need re-inspected. This effort was begun in conjunction with criteria changes to be addressed below.

The cause of the problem was being addressed by the constructor simultaneously with determining the extent. It was originally thought that the problem was due to inspection procedure criteria for acceptance being too restrictive relative to the imposed code (ASME, Section III Subsection NF, Winter 1973 Addenda). The 100% re-inspection program commenced utilizing

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inspection procedures that were revised to incorporate NF acceptance criteria verbatim. In addition, efforts were extended on the part of the constructor to conduct training session for welding and QC personnel to perform the reinspection and future welding inspection to NF criteria.

During the course of reinspection, and as committed by the contractor in response to the CAR, a Nonconformance Notice (NCN) was initiated to document deficient conditions and obtain correction of deficient hardware. The NCN was written January 18, 1979, to resolve the specific hardware addressed in the CAR, and the constructor's QC discipline elected to periodically revise the NCN to document deficiencies as discovered by reinspection. The NCN was revised on June 14, 1979. In addition, the SCE&G QA organization monitored the reinspection and new welding utilizing programmatic surveillance. Surveillance efforts revealed that welding and inspection efforts performed after March showed improvements, however, the reinspection effort, although improving, still remained problematic. During the initial reinspection period, the constructor's QC organization again assessed the cause and determined that in addition to the criteria concerns previously described, it appeared that inspection personnel were interpreting criteria when evaluating welding of marginal quality. A supplemental response to the CAR was provided to indicate this fact.

The NCN, as revised on June 14, 1979, was transmitted to engineering personnel to assess reportability. The NCN was of the type which programatically documented conditions that did not require engineering disposition but allowed for correction of deficient hardware by standard procedures. This is known as a NCN-B whereas those requiring engineering dispositions are NCN-A's. Therefore, the intent was to correct welding problems. Engineering personnel evaluated by physical observation conditions noted on the NCN-B, and concluded that the conditions were of an "accept as-is" nature and would not have caused problems if gone uncorrected. The realization that the engineering evaluation of specific hardware identified in the NCN-B could not be used to unequivocally state the problem was not reportable, as future hangers found could cause a problem if gone uncorrected, predicated the July 30th notification as a potential significant deficiency. A final determination by engineering personnel would necessitate waiting until all deficiencies were identified.

During discussions with Region II, I & E personnel subsequent to the July 30th notification, a reassessment of the implemented corrective actions was performed and some modifications subsequently made. Engineering personnel evaluated the NF acceptance criteria and made it more definitive than verbatim code words where engineering analysis of section thicknesses and application permitted. The constructor's QC personnel were given another indoctrination session with respect to the defined criteria. The reinspection

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program was again initiated "from scratch" on all welding performed prior to August 6, 1979. Finally, it was decided that a NCN-A would be initiated to obtain engineering disposition of deficient welds that could not effectively be handled by the NCN-B and standard re-work procedures.

The new corrective action program has been implemented and is projected to be completed by December 1979. SCE&G/QA personnel will continue to monitor this program and assess proper implementation to assure acceptable hardware. Also, responsible engineering personnel have concluded that, due to the time element in obtaining completed corrective action and analyzing all weld deficiencies found to make a determination of reportability, this item is to be handled as reportable, and followed to completion of the corrective actions to assure acceptable hardware. A final report on this item is projected for December 1979, when corrective actions are tentatively scheduled to be complete.

On August 23, 1979, SCE&G identified to Region II a potential problem with 7300 Series Process I & C Cards supplied by Westinghouse. This item was reported to the NRC as a 10CFR21 reportable item as reflected by Westinghouse correspondence attached to this letter. SCE&G has been requested by Westinghouse to have the cards physically examined to determine if defectives were supplied to SCE&G. Problem resolution will be provided by Westinghouse as described in the attachments. The notification given Region II on August 23 is considered potential since SCE&G may not possess defective cards. A final report will be provided subsequent to the physical examination of cards supplied to SCE&G.

Our update of previously reported items is as follows:

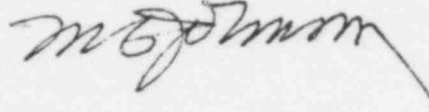
1. Condensate Storage Tank - No change in the status reported August 17, 1979.
2. Containment Airlock - No change in the status reported August 17, 1979.
3. Steam Generator Level Indication - No change in the status reported July 10, 1979.
4. Pipe Support Loadings, Velan Valves - No change in the status reported August 17, 1979.
5. RT Film Deficiencies - No change in the status reported June 18, 1979.

Documentation associated with the above items is available for NRC review during inspections at the Site. If any additional information is deemed necessary, please feel free to contact us.

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Very truly yours,



DRM/MCJ/vtw

cc: C. J. Fritz
G. C. Meetze


of Inspection and Enforcement
Washington, D. C.

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