

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

July 17, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulation Commission
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Qualification of Inspection,
Examination, and Testing and
Audit Personnel (Generic Letter
81-01)

Dear Mr. Denton:

In response to NRC Generic Letter 81-01, South Carolina Electric and Gas Company submits the Virgil C. Summer Nuclear Station positions on Regulatory Guide 1.58, Revision I and Regulatory Guide 1.146, Revision O. These positions will be incorporated in the next FSAR amendment (#27).

If you have any questions, please let us know.

Very truly yours,

T. C. Nichols, Jr.
T. C. Nichols, Jr.

RBC:TCN:1kb

Attachment

cc: V. C. Summer
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For the period prior to issuance of an operating license, the Virgil C. Summer Nuclear Station QA program has and is continuing to use an alternate approach to Regulatory Guide 1.58. This program is described below:

Designated SCE&G or GAI personnel review the inspection, examination and testing procedures of vendors and contractors who supply nuclear safety-related services for the Virgil C. Summer Nuclear Station. SCE&G or GAI also reviews applicable vendor and contractor procedures which establish the qualification of inspection, examination and testing personnel.

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These procedures are reviewed prior to their application to SCE&G material or equipment and proposed documentation of personnel qualification to the extent required by the nature and scope of the work is verified prior to acceptance of the material or equipment when performed by the vendor or contractor. SCE&G and GAI personnel responsible for reviewing procedures, performing surveillance for procedure implementation and verifying inspection, examination and testing records are knowledgeable and qualified in their particular area of inspection, examination or testing.

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SCE&G or GAI does not impose a three-level qualification of inspection, examination and testing personnel on vendors and contractors, except in those cases where non-destructive examination (NDE) is required. Within the scope of the NDE services specifications, qualifications of personnel performing non-destructive examination are in accordance with SNT-TC-1A and applicable codes.

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The quality assurance programs of vendors or contractors which have been reviewed and approved by SCE&G or GAI have provisions for the indoctrination and training of personnel as required by 10 CFR 50, Appendix B, Criterion II. Vendors and contractors were surveyed by SCE&G or GAI and were required to have indoctrination, training and certification programs designed to meet the needs of the inspection, examination or test required. These programs

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vary in scope and complexity commensurate with the nature of the work performed by these suppliers and the importance of the item or service involved.

Vendors and contractors that have done or are now doing work on or for the project's safety-related items and services comply with many elements of N 45.2.6.

11 The SCE&G/QC Program that has been used and is continuing to be used during the construction phase was established in accordance with 10 CFR 50 Appendix B. The elements of the QC program are similar to those imposed on vendors and contractors.

Subsequent to issuance of an operating license, the Virgil C. Summer Nuclear Station QA program will utilize ANSI 18.1-1971 for onsite operations organization personnel requiring qualification to this standard as defined in Chapter 13.

27 For personnel whose qualifications are not required to meet those
19 specified in ANSI 18.1 and who are performing inspection, examination
23 and testing activities during the operational phase of the plant shall
be qualified to ANSI N 45.2.6-1978 except the experience cited for
levels I, II and III shall be interpreted to mean overall experience in
inspection, examination and testing activities being performed; and except
for major modifications which will revert to the QA program defined in
Section 17.1.

1.146

QUALIFICATION OF QUALITY ASSURANCE PROGRAM AUDIT PERSONNEL
FOR NUCLEAR POWER PLANTS (REVISION 0; 8/80)

South Carolina Electric and Gas Company meets the requirements of this regulatory guide.