

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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T.C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

August 20, 1981

Mr. James P. O'Reilly, Director
UNITED STATES NUCLEAR REGULATORY COMMISSION
Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30303

Subject: V. C. Summer Nuclear Station
Unit #1 - Response to 50-395/NRC
Audit Report 81-13

Dear Mr. O'Reilly:

This is in response to your audit report No. 50-395/81-13. As discussed with your Mr. W. H. Miller, Jr. on August 17, this letter is to document the status of SCE&G action on items contained in report 81-13. The following should be noted as relevant and important to ultimate closeout of items contained in report 81-13.

1. In Amendment No. 27 which is scheduled to be issued on August 21 the response to FSAR question 421.77 and Chapter 9.5 is being revised to clarify that the QA/QC program applies to "fire protection equipment and systems for areas containing safety related equipment."
2. To address NRR's questions on SER open item 1.6.10, the apparent discrepancies with the written version of the SER, and the NRC's concerns on Appendix R, SCE&G provided on July 16, 1981, a letter to Mr. Harold Denton. A copy of this letter is attached. NRR's review of this submittal is currently in progress and will be addressed in the next supplement to the SER.
3. In response to Deviation 81-13-02, SCE&G has identified the cause of the conditions noted as interpretation of the commitment reflected in FSAR question 421.77. At the time of preparation of the QC inspection program associated with fire protection systems, SCE&G's program was developed based on the words "procedures similar to those used for safety related work" meaning that coverage would be applied to the installation to the extent that a high degree of confidence existed that the installation was adequate (allowing for some discretion with respect to scope of inspection for non-safety systems). The interpretation used by the I&E inspector was that inspection of certain items and systems was required for "similar to those used for safety related work", resulting in the deviation.

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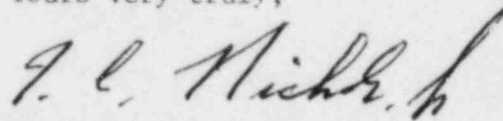
To correct the conditions noted in the deviation, SCE&G has clarified the definition as to the equipment and systems covered by the QA program as described in item 1 above. We have also established an action program to address the items noted in the deviation to avoid further interpretation problems. These inspections are either done or in process with an anticipated completion date of approximately one month.

SCE&G has determined that no actions are required programmatically to prevent recurrence of this problem since the problem was isolated and specific to the fire equipment noted and not the inspection system. Also, the solution is specific to the items noted with no generic implications.

SCE&G considers this letter a final response to Deviation 81-13-02 with targeted completion of inspections in a month. If any of the above circumstances are known to change, SCE&G will apprise the Region via supplemental correspondence. The NRC Resident Inspector will be kept advised of progress on this subject and documented evidence will be made available to the Regional Inspector upon his return to the plant site.

If any questions arise concerning the information contained herein, please call.

Yours very truly,



T. C. Nichols, Jr.
Vice President & Group Executive
Nuclear Operations

RBC:WTF:TCN:ks

Attachment

cc: V. C. Summer
G. H. Fischer
H. N. Cyrus
T. C. Nichols, Jr.
O. W. Dixon, Jr.
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