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May 11, 1994  
Refer to: RC-94-0134

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT 94-02

This letter provides the South Carolina Electric & Gas Company (SCE&G) response to a Notice of Violation delineated in NRC Inspection Report No. 50-395/94-02.

SCE&G is not in agreement with this violation. The basis for this disagreement is contained within the attached reply.

Should you have any questions, please call at your convenience.

Very truly yours,

*John L. Skolds*  
John L. Skolds

RAM:lcd  
Attachment

c: O. W. Dixon  
R. R. Mahan (w/o Attachment)  
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PDR ADOCK 05000395  
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NUCLEAR EXCELLENCE - A SUMMER TRADITION!

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RESPONSE TO NOTICE OF VIOLATION  
NUMBER 50-395/94-02-01

I. RESTATEMENT OF VIOLATION

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Nuclear Training Manual Chapter 7, Training Documentation, Revision 0, Section VII.B.4, of Chapter 7, required that Student folders will be established for each permanent employee and long-term contractor. Student folders will contain:

- ...4. Remedial training documents. This section contains documentation related to any remedial training completed as a result of exam or evaluation failure or audit results."

Contrary to the above, the student folders for four licensed operators who failed to achieve an acceptable level of competence on weekly examinations, administered during the 1991 and 1993 requalification cycles, did not contain documentation describing the type of remedial training required or received prior to retesting.

II. SCE&G POSITION ON THIS VIOLATION

SCE&G denies the violation as stated above.

III. BASIS FOR SCE&G POSITION

This violation is based upon a procedure violation of the Nuclear Training Manual, Chapter 7. This Nuclear Training Manual standardizes the Nuclear Training Department documents and records to the extent possible for multiple training programs (e.g., mechanical and electrical maintenance training, station orientation training, health physics training, etc.). This manual was issued, as revision 0, on December 21, 1993. Prior to this date, the licensed operator requalification training documentation was referenced in paragraph 14.0 of the training program. It is inappropriate to apply Nuclear Training Manual criteria to activities that predated the manual.

The licensed operator training program is unique in nature, requiring it to be proceduralized in great detail. The Nuclear Training Manual, Appendix II.5, defines the requalification program for USNRC licensed operators and senior operators. The appendix differentiates between the requirements for a quiz taken by the licensed operator during the normal training cycle (Section 7.0 Step E) and the requirements (Section 10.0) for the requalification examination administered to licensed operators per 10 CFR 55.59.

All quiz results are documented in a student's training record. Students are required to review each quiz taken and sign the coversheet. This signature signifies they understand the correct answer to the questions missed. Since the remedial action for a failed quiz is always a review of the quiz and self-study followed by a make-up quiz, the quality of the student's training record would not be enhanced by adding a statement that remedial action was self-study followed by a make-up quiz.

The annual operating and two-year written examinations are comprehensive and cover all aspects of a licensed operator's duties. Failure of either examination requires the individual to be removed from licensed operator duties, enrolled in a "remedial requalification program," and successfully retested. This "remedial requalification program" must be documented to maintain a clear history of that individual's training activities.

In November 1987, the NRC conducted an inspection of the licensed operator program (NRC Inspection Report 50-395/87-32). The inspection identified an Inspector Follow-up Item (IFI) in the documentation of remedial training (IFI #395/87-32-02). The IFI was specific to remedial training when an operator is removed from licensed operator duties due to a failed examination. In response to this inspection, documentation requirements were added to training procedures and have been consistently implemented since that time. This IFI was closed in NRC Inspection Repo 50-395/89-12.

The body of NRC Inspection Report 50-395/94-02 states "the student folders did not contain any documents related to remedial training." Student folders for licensed operators do contain documentation related to remedial training completed as a result of examination failure which is consistent with the Nuclear Training Manual requirements.