

USNRC REGION II
SOUTH CAROLINA ELECTRIC & GAS COMPANY
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T. C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

October 26, 1981 OCT 29 P 1: 02

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street, N.W.
Atlanta, Georgia 30303

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
RII: JLS-50-395/81-23

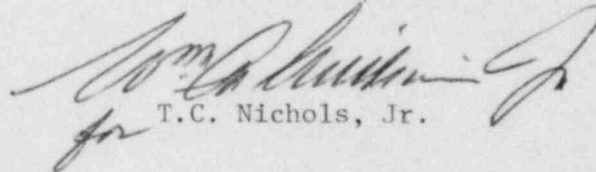
Dear Mr. O'Reilly:

Attached is South Carolina Electric and Gas Company's response to the referenced report which summarizes Mr. J.L. Skolds' inspection of August 1 through August 31, 1981. Specifically, we have addressed the violation concerning review of procedures by Quality Assurance.

Should you have questions or comments, please contact us at your convenience.

I declare the statements and matters set forth herein are true and correct to the best of my knowledge, information, and belief.

Very truly yours,


T.C. Nichols, Jr.

J/P/TCN/bsg
Attachment

cc: V.C. Summer	J.L. Skolds
G.H. Fischer	J.B. Knotts, Jr.
H.N. Cyrus	I&E (Washington)
T.C. Nichols, Jr.	NPCF
O.W. Dixon, Jr.	File
D.A. Nauman	
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R.B. Clary	
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M.N. Browne	
H.E. Yocom	
B.A. Bursey	
J.C. Ruoff	

SOUTH CAROLINA ELECTRIC & GAS CO.
VIRGIL C. SUMMER NUCLEAR STATION, UNIT #1

DOCKET NO: 50-395
REPORT NO: RII: JLS 81-23
NOTICE OF VIOLATION
EVENT DATE: August 1-31, 1981

DESCRIPTION OF EVENT

10CFR50, Appendix B, Criterion V, requires activities affecting quality be prescribed by documented instructions, procedures or drawings appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Section 4.5.2 of the Operational QA Plan requires QA review of the Start-up Manual prior to implementation. Section 4.6 of the Operational QA Plan requires that changes to procedures receive a level of review equivalent to the applied to the original procedures.

Contrary to the above, changes to the Start-up Manual did not receive a level of review equivalent to that applied to the original procedures in that QA did not review minor changes prior to implementation.

ADMISSION OR DENIAL OF ALLEGED VIOLATIONS

SCE&G recognizes that this item constitutes a violation of the aforementioned regulatory requirements in that minor changes were made in the Start-up Manual that changed the intent of the procedures and did not receive a review equivalent to that applied to the original procedures as required by Sections 4.6 and 4.5.2.

REASONS FOR VIOLATION

The reasons for the violation are two-fold. First, when the start-up program was developed, minor changes were not considered changes since they were defined to preclude alteration of the intent of procedures, and therefore be outside the scope of the QA Plan review purposes. Second, the QA Plan review requirements were developed after the start-up program and minor changes were not addressed based on the logic that minor (no intent modification) changes were not considered changes and therefore need not be addressed.

The problem leading to the violation occurred when minor changes were made that changed the procedure intent which fell within the QA Plan review requirements. At this point a QA Plan violation occurred which was not detected within the review, surveillance, or audit efforts of the QA Program. Also, it now became apparent that the logic used to contend that minor changes do not constitute changes may not be clearly supported on a program basis.

Report No: RJI: JLS 81-23, Notice of Violation

CORRECTIVE STEPS TAKEN

To correct the conditions noted in the violation and eliminate the possible weaknesses in logic regarding minor changes, the following intermediate actions have been taken:

- a) Revision 3 of SUM-B-3 was approved on September 4, 1981, deleting all references to "minor changes."
- b) The V. C. Summer Quality Assurance Group has reviewed and concurred with all minor changes affected. This review confirmed the changes could not have jeopardized the safety of operations of the V. C. Summer Nuclear Station at any time.
- c) The SCE&G QA Section has assessed the potential for similar problems existing in other procedure review cycles. The conclusion is that a very low probability exists for this condition to be elsewhere since other procedures under the QA Plan do not utilize the "minor change" logic, the QA participation in the review cycles as tracked within QA indicates that procedures are being reviewed, and surveillance and audits to date have revealed few problems concerning review cycles.

CORRECTIVE STEPS TAKEN TO PRECLUDE RECURRENCE

The Manager, V. C. Summer Nuclear Station, will coordinate efforts with the Quality Assurance Group in assuring that frequent QA surveillances include provisions for assuring conformance to the procedure review program and that the requirements of the Operational Quality Assurance Plan are implemented in a timely manner.

DATE OF FULL COMPLIANCE

South Carolina Electric & Gas Company anticipates being in full compliance with the above statements by November 1, 1981.