

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

December 23, 1982

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

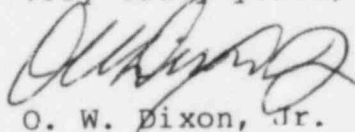
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Notices of Violation and Deviation
NRC Report 82-54

Dear Mr. O'Reilly:

Please find attached South Carolina Electric and Gas Company's (SCE&G) response to the Notices of Violation and Deviation as addressed in Appendix A and B of NRC Inspection Report 82-54.

If there are any questions, please call us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

CJM:OWD:meb
Attachments

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ATTACHMENT I
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 82-54

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the stated violation.

II. REASON(S) FOR THE VIOLATION

The violation was the result of the electrical circuit breaker for the slow speed Reactor Building Cooling Unit Fan XFN-64B being open with discharged closing springs. This event appears to be an isolated case for which the cause has not been determined. The fan was selected on the Main Control Board to automatically start in the event of an Engineered Safety Features Actuation, however, the fan would not have started in slow speed upon receipt of an auto start signal as required in Technical Specification 3.6.2.3. This violation will be referred to as Violation #1 for the remainder of this report.

The NRC Resident Inspector identified an additional violation November 23, 1982. The Plant was in Mode 1 when the Inspector observed that the control switch for Control Room Normal Fan (XFN-32A) was in the stop position which effectively rendered the fan inoperable in violation of Technical Specification 3.7.6. This fan should have been available to start automatically upon an Engineered Safety Features Loading Sequence (ESFLS) or a high radiation signal. Apparently the fan was misaligned on November 21, 1982 at 1419 hours upon the conclusion of Power Operational Test (POT-11) which initiated a Station Electrical Blackout. This conclusion is based on:

1. A review of the Operator Log readings confirmed that the fan was operating on November 18, 1982.

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2. Upon conclusion of the Power Operational Test (POT-11) when the operators were in the process of re-aligning the HVAC Panel, their work was interrupted by a disturbance, requiring their investigation, on the 482 Elevation of the Control Building.

The November 23, 1982 violation will be referred to as Violation #2 for the remainder of this report.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Violation #1

Upon notification of this condition by the NRC Inspector, immediate corrective action was taken to restore the affected breaker to Operable status by recharging the closing spring. An inspection was also performed on all 480V Safeguard Switchgear Breakers for similar problems. No additional problems were discovered.

Violation #2

Upon notification of the inoperable condition of the Control Room Normal Fan by the NRC Inspector, the control switch was removed from the stop position. The fan was declared operable upon the satisfactory performance of the Control Room Emergency Air Cleanup System Operability Test (STP-124.001) at 2220 hours on November 23, 1982.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

Violation #1

The 480V electrical switchgear alignments contained in System Operating Procedures are in the process of being revised to include signoff verifications that the closing mechanisms are charged and power is available to the recharging motor.

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Additionally, a Preventive Test Procedure is under development which will perform a monthly check for the verification that the spring motor switch and charging mechanism are in the operable position.

Violation #2

The Emergency Operating Procedure for Station Blackout Operation (EOP-4) follow-up action will be revised to include a checklist for the restoration of systems to normal operational status to avoid further violations of this nature.

V. DATE OF FULL COMPLIANCE

All corrective actions identified in the above will be complete by January 30, 1983.

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ATTACHMENT II
RESPONSE TO NOTICE OF DEVIATION
INSPECTION REPORT 82-54

I. ADMISSION OR DENIAL OF THE ALLEGED DEVIATION

South Carolina Electric and Gas Company is in agreement with the stated deviation.

II. REASON(S) FOR THE DEVIATION

The deviation was the result of procedural omissions in System Operating Procedure (SOP-101) and Surveillance Test Procedure (STP-142.001). The Emergency Operating Procedure (EOP-15), which is utilized during an unusual plant condition requiring the venting of the Reactor Vessel, was correctly developed with the assumption that the Reactor Vessel Head Vent Valves were shut and de-energized prior to and after usage. System Operating Procedure (SOP-101), which initially aligns Reactor Coolant System equipment for operation, and Surveillance Test Procedure (STP-142.001), utilized for valve operability tests, failed to de-energize the subject valves following use.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The Reactor Vessel Head Vent Valves have been de-energized and Danger Tagged to the Shift Supervisor in order to insure compliance with Section 5.5.15.2.1 of the Final Safety Analysis Report.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER DEVIATION

System Operating Procedure (SOP-101) will be revised to de-energize the subject valves upon completion of Reactor Vessel filling and venting. Additionally, the Reactor Coolant System Operability Test performed on Surveillance Test Procedure (STP-142.001) will also be revised to allow temporary re-energization of the valves for the purpose of operational verification. The Surveillance Test Procedure will verify that valves are shut and de-energized upon completion of test.

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V. DATE OF FULL COMPLIANCE

All corrective actions identified above will be complete by January 15, 1983.