

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

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March 29, 1983

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30303

SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Notice of Violation
NRC Report 83-01
"Refueling Water Storage Tank
Level Instrumentation"

Dear Mr. O'Reilly:

South Carolina Electric and Gas Company is in agreement with the alleged violation addressed in Appendix A of NRC Inspection Report 50-395/83-01.

As stated in the report, Refueling Water Storage Tank (RWST) instrumentation channel 990 was not placed in the tripped condition within one (1) hour of being declared inoperable. Operations personnel failed to recognize the applicability of Technical Specification 3.3.2, Action Statement 19, until three (3) hours and 45 minutes after the failure of the RWST level instrumentation on January 19, 1983. Technical Specification 3.0.3 was implemented instead of the Action Statement since there were two (2) inoperable RWST level instruments at this time and the plant was in a condition beyond what is described in Action Statement 19.

The failure to place RWST instrumentation channel 991 in a tripped condition at 1304 hours was due to the inverse logic used on these particular bistables in comparison to the logic used in similar applications. The technical personnel who were directed to place the channel in the tripped condition failed to recognize the inverse logic and consequently placed the channel in the bypassed condition.

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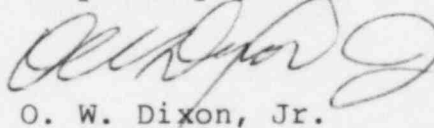
An evaluation of the various Action Statements identified in Table 3.3-3 of Technical Specification 3.3.2 was performed after the failure of the RWST level instrumentation. This evaluation identified that an incorrect Action Statement existed for these instruments in that the inoperable channel should have been placed in a bypassed condition instead of the tripped condition. Amendment 10 to the Technical Specifications was subsequently approved and issued by the Nuclear Regulatory Commission on February 4, 1983.

To ensure that all Limiting Conditions for Operation (LCO) are identified and implemented on failure of equipment required to be operational, the following program will be established:

1. A cross reference table is being prepared which identifies Reactor Trip and Engineered Safety Feature Actuation System Instrumentation as they relate to the associated LCO and Surveillance Test Procedures used to satisfy the Technical Specification Surveillance Requirements. This table is being incorporated into the Reactor Protection and Control System operating procedure (SOP-401) which is currently in the review process with an expected issue date of April 30, 1983.
2. In addition to the above, the development of a master cross reference of Technical Specification components with their associated LCO's, Action Statements, and Surveillance Requirements is being pursued. The information is tentatively planned to be in a computer based program which should eliminate the possible failure to recognize an LCO when a component becomes inoperable. A completion date for this master cross reference cannot be determined at this time because of the complexity and scope of the endeavor. It is expected that this study will be completed by September 15, 1983, at which time a followup report will be submitted defining the final course of action and schedule for completion.

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

Very truly yours,



O. W. Dixon, Jr.

CJM:OWD/dwf/fjc
cc: See Page Three

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