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October 14, 1994
Refer to: RC-94-0267

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
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT 94-19

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Level IV violation delineated in NRC Inspection Report No. 50-395/94-19. SCE&G is in agreement with the violation.

If there are any questions, please contact Mr. R. M. Fowlkes at (803) 345-4210.

Very truly yours,

John L. Skolds

cjm

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REPLY TO A NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/94-19-01

I. RESTATEMENT OF VIOLATION

Technical Specification 6.8.1.c requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Section 7.c.(1) of Appendix A, recommends procedures for control of radioactivity for collection, storage and discharge from the pressurized water reactor gaseous effluent system. System Operating Procedure, SOP-119, provides guidance on the operation of the waste gas processing system. Attachment I of SOP-119 requires valves XVD07881-WG and XVD07883A-WG to be closed after transferring waste gas to decay tanks.

Contrary to the above, the operator failed to close valves XVD07881-WG and XVD07883A-WG following a transfer of waste gas to the shutdown gas decay tank. Subsequently, on August 12, 1994, during a planned release of waste gas decay tank "G", the inservice waste gas decay tank "A" was also released.

II. STATEMENT OF POSITION

South Carolina Electric & Gas Company (SCE&G) is in agreement with the violation as stated.

III. REASON FOR THE VIOLATION

The failure to close valves XVD07881-WG and XVD07883A-WG on completion of the aforementioned transfer is considered to be the result of personnel error. A review of previous activities on this system determined that the valves had apparently been left open during a transfer of waste gas on May 16, 1994. The procedure in use during the transfer provided adequate direction; however, it is believed that the personnel assigned the task became involved in other work and failed to finish the waste gas transfer procedural requirements. Completion of this portion of the procedure would have closed the subject valves.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The release was terminated immediately after Operations personnel observed that both tanks A and G were depressurizing instead of the intended release of only tank G. A subsequent verification of system alignment found that valves XVD07881-WG and XVD07883A-WG were in the open vs. closed position.

Evaluation of the inadvertent release found that even with the release of the contents of tank A, the resulting offsite doses were within the limits established in the Offsite Dose Calculation Manual (ODCM). The setpoint established on the discharge effluent monitor was conservative and would have stopped the release if the combined activity of the tanks had exceeded the instantaneous release rate limits.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

System Operating Procedure (SOP) 119, "Waste Gas Processing," was revised on September 2, 1994, to verify proper position of system valves prior to initiating a tank release. This change provides additional assurance that an unintentional release will not occur in the future.

In addition to the upgrade to SOP-119, SCE&G will place a copy of this violation response in the Operations Department required reading. Review of this response will emphasize the importance of procedural compliance and completion of work activities.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance with the completion of the aforementioned required reading. This action is expected to be complete by December 1, 1994.