



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4344

Gary J. Taylor
Vice President
Nuclear Operations

January 20, 1995
Refer to: RC-95-0017

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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO INSPECTION REPORT 50-395/93-15
RESPONSE TO GENERIC LETTER 88-17

South Carolina Electric & Gas Company's (SCE&G) has evaluated the NRC's request to revise the response to Generic Letter (GL) 88-17 as it pertains to the requirements for Reactor Coolant System (RCS) level monitoring instrumentation. There appears to be inconsistencies between the recommendations of GL 88-17 and the proposed rule on shutdown and low power operation in the area of RCS level monitoring instrumentation. SCE&G has implemented a plant modification which provides two independent RCS level indication systems (acoustic monitors) which monitor level during mid-loop operation. This system appears to meet the requirements of the proposed rule for shutdown and low power operations. Therefore, SCE&G plans no further action in response to this item until the final rule is issued which clearly delineates the requirements for RCS level monitoring.

Should there be further discussion necessary for this issue, please contact Mike Fowlkes of my staff at (803) 345-4210.

Very truly yours,


Gary J. Taylor

CAC/GJT/nkk

c: O. W. Dixon
R. R. Mahan
R. J. White
S. D. Ebnetter
G. F. Wunder
NRC Resident Inspector
J. B. Knotts Jr.
NSRC
Central File System
RTS (IE 931504)
File (815.14)

9501310160 950120
PDR ADOCK 05000395
P PDR



NUCLEAR EXCELLENCE - A SUMMER TRADITION!

Adol



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

JUN - 2 1993

Docket No.: 50-395
License No.: NPF-12

South Carolina Electric & Gas Company
ATTN: Mr. John L. Skolds
Vice President, Nuclear Operations
V. C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, SC 29065



Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-395/93-15

This refers to the inspection conducted by R. C. Har of this office on April 1 through May 10, 1993. The inspection included a review of activities authorized for your V. C. Summer facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the report.

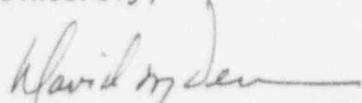
Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The enclosed Inspection Report identifies activities that violated NRC requirements that will not be subject to enforcement action because the licensee's efforts in identifying and/or correcting the violation meet the criteria specified in Section VII.B. of the Enforcement Policy.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure(s) will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,


David M. Verrelli, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Enclosure:
NRC Inspection Report

cc w/encl: (See page 2)

9307000085. 1/P



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-395/93-15

Licensee: South Carolina Electric & Gas Company
Columbia, SC 29218

Docket No.: 50-395

License No.: NPF-12

Facility Name: Virgil C. Summer Nuclear Station

Inspection Conducted: April 1 through May 10, 1993

Inspectors: For R. W. Wright
R. C. Haag, Senior Resident Inspector

6/2/93
Date Signed

For R. W. Wright
L. A. Keller, Resident Inspector

6/2/93
Date Signed

J. L. Shackelford, Reactor Inspector
(April 5-9, 1993)

L. Garner, Senior Resident Inspector,
H. B. Robinson (May 1, 1993)

R. W. Wright, Project Engineer
(May 3-7, 1993)

Approved by:

Floyd S. Cantrell
Floyd S. Cantrell, Chief
Reactor Projects Section 1B
Division of Reactor Projects

6/2/93
Date Signed

SUMMARY

Scope:

This routine inspection was conducted by the resident inspectors onsite in the areas of monthly surveillance observations, complex surveillance observations, monthly maintenance observations, operational safety verification, engineered safety feature system walkdown, action on previous inspection findings, and onsite follow-up of events at operating power reactors. Selected tours were conducted on backshift or weekends. These tours were conducted on eight occasions.

Results:

Overall coordination and implementation of the integrated safeguards tests was good. A procedural deficiency was identified for the loss of offsite power portions of the test in that the documentation of a Technical Specification requirement was not provided (paragraph 4). All maintenance activities

9307020299 13P

observed were well planned and executed (paragraph 5). As a result of inspections in the area of reduced inventory operations, the licensee's response to Generic Letter 88-17 was found to be unacceptable (Paragraph 6.b). A non-cited violation was identified for failure to comply with a procedural requirement during dilution to criticality (paragraph 6.c).

without success. The nuts on the flange studs were removed and replaced with special nuts equipped with fittings through which a furmanite type material was pumped by contracted personnel. This fix appeared to have worked but will be verified by further licensee monitoring as the plant increases power to 100 percent.

- * Inspect, service, and clean various air conditioning condenser units and air handling units (PMTS 165823, 165832, 165833, 165821, 165828, 165829). Routine preventive maintenance in accordance with applicable portions of procedures MMPs 460.003, 460.022, and 460.025 was observed performed satisfactorily on the condenser units and air handling units serving the HP count room, and TSC computer room located in the control building. No discrepancies were noted.
- * Installation of new potential transformer in circuitry associated with the "B" EDG synchroscope (MWR 215840008). The circuitry associated with the "B" EDG synchroscope has had problems with voltage spikes. MRF 21584 directed replacing a 1:1732 ratio potential transformer (PT) with a 1:1 ratio PT. The inspector noted that all aspects of this maintenance activity were satisfactory.

The maintenance activities discussed above were well planned and executed.

6. Operational Safety Verification (71707)

a. Plant Tour and Observations

The inspectors conducted daily inspections in the following areas: control room staffing, access, and operator behavior; operator adherence to approved procedures, TS, and limiting conditions for operations; and review of control room operator logs, operating orders, plant deviation reports, tagout logs, and tags on components to verify compliance with approved procedures.

b. Reduced Inventory Following Steam Generator Work

On April 16, 1993, the unit went into a second reduced inventory in order to remove steam generator nozzle dams and perform work on various valves. The inspector observed the drain down from 4 inches below the reactor vessel flange to mid-loop plus 9 inches. The inspector noted that RVLIS was inoperable during the drain down and that the ultrasonic level indicators were unable per design to provide level indication until level receded below the top of the flow area of the RCS hot legs at the junction with the Reactor Vessel. This meant that the only level indication, while the RCS was between 4 inches below the flange and the top of the hot legs, was tygon tubing. The ultrasonic level indicators did perform well once level went below the top of the hot legs. The inspector considered the pre-job briefing for this activity to be thorough. Control room demeanor and communications were good.

SCE&G Company's response to the six programmed enhancements identified in Generic Letter 88-17 dated February 2, 1989 states, "V. C. Summer will have installed prior to the end of the next refueling outage (RF5) two independent RCS level indication systems. Each will measure, indicate, and alarm the RCS level". NRR concluded that acceptance of licensee GL 88-17 responses would be based on verification by NRC inspection of licensee commitment actions per TI 2515/103.

Both GL 88-17 and TI 2515/103 require two independent RCS level indication systems to be operable prior to entering a reduced inventory condition, which is defined as a condition where the reactor vessel level is lower than three feet (nominal) below the reactor vessel flange. However, as stated above, the plant had only one RCS level indicator (tygon tubing) capable of providing the full range of indication before entering their second reduced inventory condition.

Subsequent to this inspection the licensee was notified that Summer's response to GL 88-17 was unacceptable, and therefore must be revised to include the specifics on how the required two independent level indications for reduced inventory operation (as defined in GL 88-17) will be met.

c. Plant Start-up from Refueling

The inspector reviewed plant startup activities during the recovery from the recent refueling outage which ended on May 3, 1993. The inspector ascertained that systems disturbed or tested during the refueling outage were returned to an operable status before plant startup and that plant startup, heat-up, approach to criticality, and core physics tests following the outage were conducted in accordance with approved procedures. Before plant startup, the inspector performed a walk-through of appropriate portions of the emergency feedwater, safety injection, and EDG support systems disturbed during the refueling outage and independently determined that these systems were returned to service in accordance with approved procedures.

On May 1, 1993, the inspector observed activities associated with bringing the reactor critical. Specifically, the inspector witnessed partial performance of GOP-3, "Reactor Startup From Hot Standby To Startup (Mode 3 To Mode 2)", Revision 8, and REP-107.003, "Beginning Of Cycle Dilution To Criticality, Revision 5."

During the approach to criticality, the inspector observed that item 3.3 of REP-107.003 section 3, entitled "Notes, Precautions and Limits", was not implemented. Item 3.3 states: "If the count rate on any source range channel increases by more than a factor of two during any increment of control bank withdrawal or during any one Inverse Count Rate Ratio (ICRR) interval during boron concentration reduction, positive reactivity insertion shall be