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Refer to: RC-94-0297

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Washington, DC 20555

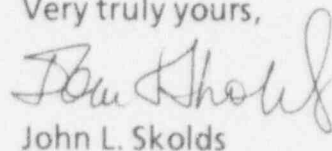
Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 94-22

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Level IV violation delineated in NRC Inspection Report No. 50/395-94-22. SCE&G is in agreement with the violation.

If there are any questions, please contact Ms. A. R. Rice at (803) 345-4232.

Very truly yours,



John L. Skolds

ARR:lcd
Attachment

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NUCLEAR EXCELLENCE - A SUMMER TRADITION!

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RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/94-22-01

I. RESTATEMENT OF VIOLATION

10 CFR 50, Appendix B, Criteria III states in part, "...Measures shall be established to assure that applicable regulatory requirements and the design basis for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. Measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled."

Contrary to the above, on September 14 and 15, 1994, changes were made to procedures which provided detailed instructions for the preparation of the old steam generators prior to removal from containment. These procedural changes were not made in accordance with administrative requirements, and deviated from the design document from which the procedures were written.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

On September 14, 1994, a Becon Responsible Construction Engineer (RCE) working on day shift made a pen and ink change to Work Plan and Inspection Record (WP&IR) WR-04.03-M-04, 05, and 06. These three, essentially identical, procedures control the process of work to prepare for the removal of the old Steam Generators (SG) in the area of Loop A, Loop B, and Loop C, respectively. This change was made without using the required WP&IR Change Notice. The change was initiated because a better sequencing of the work was identified during a pre-job briefing on WP&IR WR-04.03-M-06. The day shift RCE's intent with this change was to only allow the installation of SG column clevis temporary support bracket, sling and turnbuckle assemblies prior to installing the SG temporary supports. However, the Becon Superintendents for the job interpreted the change to mean that all work could proceed on SG "C" prior to installation of the temporary supports.

During night shift, work had proceeded to the point where some of SG "C" column adapter bolts had been removed. The night shift Becon RCE realized that this work was in violation of the MRF MCN which was the design document from which the WP&IR was written. The night shift Becon RCE contacted Bechtel Resident Engineering who determined that

the work was technically acceptable. No written record of this determination was made at the time. The night shift Becon RCE then made a second pen and ink change to the WP&IR that allowed continuation of the column adapter bolt removal. As in the case of the first change, this change should have been made using a WP&IR Change Notice, but was not.

When the day shift Becon PCE returned the following day and became aware that bolt removal was underway, he stopped work and notified the Becon Project Construction Engineer (PCE) who directed that all WP&IR's for this scope be pulled from the field. The PCE notified the Project Engineer (PE) and requested engineering assistance to evaluate the current condition for acceptability. It was determined by Westinghouse and Bechtel Resident Engineering that the bolt removal was acceptable.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Bechtel Resident Engineering issued MCN 90001J-5 which allowed the bolt removal that had already been performed. This made the design document (the SCE&G MRF) agree with the in-field procedure (the WP&IR). In addition, for work inside containment the Becon Site Manager and the Bechtel Project Manager stopped all WP&IR related work activities and directed that all WP&IRs be reviewed and compared to actual work performed to determine that there were no other problems. This review included physical verification where necessary. As a result of the review, several minor problems were identified and corrected. Upon being notified of the situation, SCE&G management placed a Stop Work Order on all related WP&IR work in containment. The Stop Work Order was lifted and work was resumed after SCE&G's Plant Manager and Steam Generator Replacement Project Manager agreed that all WP&IR-related problems had been identified and corrected.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The following additional corrective actions have been taken:

1. The Becon Field Engineers/Superintendents review all working WP&IRs at the end of each shift to verify that required signoffs have been properly completed and that the WP&IR correctly reflects the status of completed or in-progress work activities.
2. The Becon WP&IR work process was enhanced by requiring the craft supervisors to review the steps of the WP&IR that will be worked that shift with craft personnel performing the work prior to the start of the work activities.

3. Revision 3 to Becon Procedure WP/P-1 was made to require that minor editorial changes to WP&IRs have the signature/initials of specifically identified Becon QC Engineer(s) in addition to the signature/initials of the RCE. Major changes which require WP&IR Change Notices were already addressed in WP/P-1.
4. A memo was issued by the Bechtel Site Manager on September 19, 1994, to all Becon/Bechtel/Subcontractor employees to reinforce the requirement of procedural compliance and note the consequences of procedural violations.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is in full compliance.