



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

Gary J. Taylor
Vice President
Nuclear Operations

February 9, 1995
Refer to: RC-95-0037

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
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 94-27

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Notice of Violation delineated in NRC Inspection Report No. 50-395/94-27. SCE&G is in agreement with the violation, and the enclosed response addresses the reason and corrective actions being taken to prevent recurrence.

Should you have any questions, please call at your convenience.

Very truly yours,


Gary J. Taylor

JWP/GJT/nkk
Attachment

c: O. W. Dixon
R. R. Mahan (w/o Attachment)
R. J. White
S. D. Ebner
S. F. Fipps
NRC Resident Inspector
J. B. Knotts Jr.
J. W. Flitter
NSRC
Central File System
RTS (IE 942702)
File (815.01)

8502140325 850209
PDR ADDCK 05060395
Q PDR



NUCLEAR EXCELLENCE - A SUMMER TRADITION!

JED 1/1

RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/94-27-01

I. RESTATEMENT OF NRC VIOLATION

Technical Specification 6.8.1.c requires that written procedures be established, implemented and maintained for surveillance and test activities of safety-related equipment. Article IWC-5222 in Section XI of ASME Boiler and pressure Vessel Code states in part that the system hydrostatic test pressure shall be at least 1.25 times the system pressure, for systems with a design temperature above 200°F. Main Steam Hydrostatic Test Evaluation Calculation Number DC05600-014, Revision 0, specified the main steam system spring cans that were to be "pinned" for additional support during the secondary side hydrostatic test.

Surveillance Test Procedure, STP-249.052, Main Steam/Steam Generators Hydrostatic Testing, provided the instructions for preparation and performance of the secondary side hydrostatic test.

Contrary to the above, STP-249.052:

- A. Specified a minimum hydrostatic test pressure that was 40 psig less than 1.25 times the system pressure at the highest elevation in the test boundary; and
- B. Incorrectly listed the "spring cans" that required pinning for conducting the secondary side hydrostatic test.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

The cause of this event was personnel error in calculation of the test pressure for the hydrostatic test and inadequate procedure review.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

STP-249.052 was changed to reflect the correct hydrostatic test value and proper "spring cans" that required "pinning" prior to performance of the test. The test was satisfactorily performed.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

A review of hydrostatic testing performed since the ASME Section XI change in early 1994 was conducted to verify the adequacy of the test, pressure determinations, and the supporting calculations. This review determined that no previous hydrostatic testing had been performed at an incorrect pressure. The calculations for the hydrostatic testing previously performed by the Test Unit have been updated with respect to the corrections in the calculational methodology.

A review of the primary side hydrostatic test procedure (STP-249.051) revealed a similar problem existed and this procedure was also changed to reflect the correct hydrostatic test pressure required. The generic hydrostatic test procedure (GTP-249) review determined the instructions for performing test pressure were unclear. This procedure has been changed to clarify the calculation requirements for the determination of hydrostatic test pressure for future code testing.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is presently in full compliance.