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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 94-24

This letter provides South Carolina Electric & Gas Company (SCE&G) response to a Notice of Violation delineated in NRC Inspection Report No. 50-395/94-24.

South Carolina Electric & Gas Company is in agreement with this violation. Detailed response to this violation is attached.

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

Very truly yours,

John L. Skolds

RAM:ews
Attachment

c: O. W. Dixon
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NUCLEAR EXCELLENCE - A SUMMER TRADITION!

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RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/94-24-01

I. RESTATEMENT OF VIOLATION

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that, "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall, be accomplished in accordance with these instructions, procedures, or drawings." Paragraph 4.1 of the Operational Quality Assurance Plan which describes requirements for procedural development and usage states in part, ... "activities which affect the ability of safety-related structures, systems or components to perform their intended function must be governed by written procedures."

Contrary to the above, on October 26, 1994, a cleanliness cover was discovered missing on "A" steam generator secondary manway opening. A final cleanliness inspection the steam generator secondary side had already been performed. Approximately four days earlier a cleanliness cover was also discovered missing for a similar steam generator opening. The actual causes for the missing cleanliness covers could not be determined. However based on a review of the applicable work related documents it was determined that adequate instructions for cleanliness control were not provided.

II. SCE&G POSITION ON THIS VIOLATION

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

III. REASONS FOR THE VIOLATION

This violation occurred during steam generator replacement activities. These activities were procedurally controlled by SCE&G procedures and work documents as well as contractor procedures and work documents. Interviews with personnel who performed work on the steam generators have determined that the cleanliness covers had been installed, that the workers were aware of the requirement for the covers, and that the workers were knowledgeable of the direction provided by the procedures and work documents.

The permanent steam generator manway covers were being installed by SCE&G personnel at the time of this occurrence.

Interviews with personnel involved identified that the cleanliness covers were secured to the vertical surface of the steam generator with safety related duct tape. It is believed that the duct tape did not adhere sufficiently to hold the cleanliness covers in place and the covers fell off the manways while station personnel were not in the area.

The cleanliness control program at Virgil C. Summer Nuclear Station is prescribed in SAP-142, "Station Housekeeping Program"; GMP-100.003, "Personnel, Material, Tools, and Equipment Accountability"; and SAP-300, "Conduct of Maintenance". SCE&G provided foreign material exclusion control training to maintenance personnel as part of continuing training during 1993.

The cleanliness control program for associated contractor activities is prescribed in SAP-1022, "Guidelines for Controlling Contractor and Non-Station SCE&G Work Activities" and WP/P10, "Housekeeping".

SCE&G procedural requirements governed the work being performed relative to "A" steam generator during the time specified in this violation.

IV. IMMEDIATE CORRECTIVE ACTIONS

In response to the missing cleanliness cover, SCE&G issued a nonconformance notice requiring another cleanliness inspection of the "A" steam generator prior to installation of the permanent manway cover. The steam generator was inspected and the manway temporarily covered on October 28, 1994. No foreign material was found inside the steam generator.

V. CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

SCE&G considers that the programs for cleanliness control in effect at the V. C. Summer Nuclear Station are adequate to preclude further violations.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G is currently in full compliance.