

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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M. C. JOHNSON

VICE PRESIDENT AND GROUP EXECUTIVE
SPECIAL SERVICES AND PURCHASING

January 5, 1979

United States Nuclear Regulatory Commission
ATTN: Mr. James P. O'Reilly
Director
Marietta Building, 31st Floor
Marietta Street
Atlanta, Georgia 30302

Subject: V. C. Summer Nuclear Station
Unit #1
Response to NRC Audit Reports
50-395/78-27 dated 12/14/78
and 50-395/78-28 dated 12/15/78

Gentlemen:

In response to the above captioned reports, we have reviewed the information contained there-in and find that neither contains any proprietary information. In addition, we have evaluated the circumstances relating to the item identified as 78-27-05 in report 50-395/78-27, which dealt with four items related to drawing control which collectively represent a deficiency. Our evaluation has produced the following results:

1. Cause

As was observed by Region II Inspectors during this inspection, the underlying cause of this concern is two-fold:

- a) Existing procedures (FQCP 2.2.2, 2.2.3, & AP-IX-03), failed to include sufficient detail to assure proper handling of ECN and/or FCR hold stamps and file index distribution cards.
- b) Periodic review of QA Program documents failed to identify the growing inconsistency between our commitment to a comparison of drawing revisions to the A/E provided drawing list. Earlier in the Project when the volume of drawing revisions were small, this requirement was meaningful since the list was current. As was observed by the Region II Inspectors, by the time the list is received, it is outdated. This has resulted in the change in method of control noted.

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2. Immediate Corrective Steps Taken and Results

- a) The noted eleven incorrect file index cards have been corrected.
- b) FQCP 2.2.3 has been revised (Section 5.4) to incorporate controls for attaching/removing ECN/FCR-A Hold Stamps. The revised procedure is available for your review.
- c) FQCP 2.2.2 and AP-IX-03 have been revised to address
 - 1) Removal of document holders from distribution,
 - 2) Return of documents to Document Distribution by their holders, and
 - 3) Instructions for filling out the File Index Distribution Cards.Copies of the revisions are available for your review.
- d) The A/E began weekly update of the drawing list in December.
- e) A SCE&G/QA audit of the A/E design review system was conducted on December 13-15, 1978 with Region II in attendance. ECN/FCR controls were examined in depth and the adequacy of review of affected documents considered. The report of that audit will be available for your review during subsequent inspections.

3. Corrective Steps Taken to Avoid Future Noncompliance

- a) One Document Clerk has been appointed to coordinate the additional procedural controls indicated above.
- b) The A/E transmits the drawing with a transmittal slip which is compared to the drawings received by Documents and corrected as applicable. A copy of the transmittal is returned to the A/E and will be compared to a suspense copy to assure SCE&G has received the latest revision.
- c) The Document Distribution Supervisor (and those designees actually performing the work) have been instructed on the importance of properly filling out File Index Distribution Cards as addressed in the procedure revisions.
- d) Amendment 11 to our FSAR Chapter 17.1 dated January, 1979, has been submitted to remove the drawing list from the revision control system. Future lists will be updated monthly and used by the Document Section for information/comparison purposes.

Mr. James P. O'Reilly

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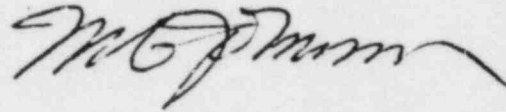
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4. Full Compliance Date

All procedure revisions were complete as of January 4, 1979.
The SCE&G/QA A/E audit report will be issued during January, 1979.

We trust that you will find our actions to resolve this item appropriate and satisfactory. Please feel free to contact us if we can provide additional information in relation to this item or the captioned reports.

Very truly yours,



DAN/MCJ/jls

cc: C. J. Fritz
G. C. Meetze