

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

April 11, 1984

APR 17 9:53

Mr. James P. O'Reilly
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street, N.W.
Atlanta, Georgia 30303

SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 84-05

Dear Mr. O'Reilly:

Please find attached South Carolina Electric and Gas Company's responses for the two (2) Violations as addressed in Enclosure 1 of NRC Inspection Report 84-05.

If there are any questions, please call us at your convenience.

Very truly yours,


O. W. Dixon, Jr.

CJM:OWD/dwf
Attachment

cc: V. C. Summer
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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATIONS
INSPECTION REPORT 84-05

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATIONS

South Carolina Electric and Gas Company is in agreement with the alleged violations.

II. REASONS FOR THE VIOLATIONS

The violations are attributed to inadequate test procedure guidelines and personnel error. The system degradation was initially observed during the performance of the weekly silent test of the Early Warning Siren System (EWSS) on February 19, 1984. However, since maintenance personnel were not sure if a test failure had actually occurred, a retest was scheduled for the following day. The retest performed on February 20, 1984, was unsatisfactory as determined by the locally mounted equipment.

Operations personnel failed to recognize the test results on February 20, 1984, as an indication of system degradation and consequently did not initiate equipment repair and required personnel notifications required by Emergency Plan Procedure (EPP) 021, "Activation of the Early Warning Siren System," (Violation 84-05-01). The failure to recognize the event as a potential degradation of the EWSS is considered personnel error.

A contributing factor to the personnel error was the failure to establish an adequate test procedure (Violation 84-05-02). The Preventive Maintenance Task Sheet utilized by maintenance personnel to perform the test did not provide sufficient test guidelines and acceptance criteria to aid Operations personnel in the determination of EWSS operability.

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ENCLOSURE 1 (cont'd)

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

At 0700 hours on February 21, 1984, the Electrical Maintenance Supervisor dispatched a crew to inspect the decoder counters located at the sirens. The counters indicated that the sirens had not received the signal from the previous day's test, and therefore, must be considered inoperable. Notifications were subsequently made in accordance with the requirements of EPP-021 at 0830 hours.

The Communications Department identified a faulty radio control module as the cause of the EWSS inoperability. The system was repaired and declared operable by 1055 hours on February 21, 1984.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The following actions were taken to prevent further violation:

- 1) On March 23, 1984, the EWSS was modified so that there are now two (2) redundant methods to activate the sirens. The modification will prevent a single component failure from disabling the entire system.
- 2) Operations and Electrical Maintenance personnel have received additional instruction on notification requirements associated with a degradation of the EWSS.
- 3) EPP-021 is being revised to have both encoders available for use in activating the EWSS. The revision is expected to be complete by May 1, 1984.
- 4) EPP-022, "Verification of Communications Operability," is being revised to include testing of sirens as required by NUREG 0654. The testing will be included into the Station Surveillance Test Program for tracking purposes. The revision is expected to be completed by May 1, 1984.

V. DATE OF FULL COMPLIANCE

South Carolina Electric and Gas Company will be in full compliance by May 15, 1984.