



South Carolina Electric & Gas Company
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John L. Skolds
Vice President
Nuclear Operations

OCT 14 1991

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 91-17

Attached is the South Carolina Electric & Gas Company (SCE&G) Licensee Event Report No. 91-006 which responds to the violation addressed in Enclosure 1 of NRC Inspection Report 50-395/91-17. SCE&G is in agreement with the alleged violation, and the enclosed response addresses the reason for the violation and corrective actions being taken to prevent recurrence. Additional corrective action items 1, 2, and 3 have been completed.

If you should have any questions, please call at your convenience.

Very truly yours,

John L. Skolds

RJB:JLS:lcd
Attachment

c: O. W. Dixon Jr.
R. R. Mahan
R. J. White
S. D. Ebner
G. F. Wunder
General Managers
C. A. Price
NRC Resident Inspector
J. B. Knotts Jr.
J. W. Flitter
NSRC
RTS (IE 911701)
File (815.01)

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PDR ADDCK 05000395
S PDR

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

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10CFR50.73
John L. Skolds
Vice President
Nuclear Operations

SEP 03 1991

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U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
LER 91-006

Attached is Licensee Event Report No. 91-006 for the Virgil C. Summer Nuclear Station. This report is submitted pursuant to the requirements of 10CFR50.73(a)(2)(iv).

Should there be any questions, please call us at your convenience.

Very truly yours,

John L. Skolds

DCH:JLS:lcd
Attachment

c: O. W. Dixon Jr.
R. R. Mahan
R. J. White
S. D. Ebnetter
G. F. Wunder
General Managers
C. A. Price
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NSRC
RTS (ONO 910043)
File (818.05 & 818.07)

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Virgil C. Summer Nuclear Station										DOCKET NUMBER (2) 0 5 0 0 0 3 9 5 1 OF 0 1 3										PAGE 15			
TITLE (4) Personnel Error Leads to an Inadvertant ESF Actuation of a Diesel Generator																							
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)													
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)										
0	8	0	4	9	1	9	1	0	0	6	0	0	0	9	0	3	9	1	0	5	0	0	0
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 16 CFR §. (Check one or more of the following) (11)																				
1			20.402(b)				20.406(c)				X 60.73a(2)(iv)				73.71(b)								
POWER LEVEL (10)			20.406a(1)(i)				60.36a(1)				60.73a(2)(v)				73.71(c)								
19			20.406a(1)(ii)				60.36a(2)				60.73a(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 306A)								
			20.406a(1)(iii)				60.73a(2)(ii)				60.73a(2)(vii)(A)												
			20.406a(1)(iv)				60.73a(2)(i)				60.73a(2)(viii)(B)												
			20.406a(1)(v)				60.73a(2)(iii)				60.73a(2)(ix)												
			20.406a(1)(vi)				60.73a(2)(iv)				60.73a(2)(x)												
LICENSEE CONTACT FOR THIS LER (12)																							
NAME W. R. Higgins, Supervisor, Regulatory Compliance												TELEPHONE NUMBER AREA CODE 8 0 3 3 4 5 - 4 0 4 2											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																							
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC				
D	E	K	D	G	N																		
SUPPLEMENTAL REPORT EXPECTED (14)															EXPECTED SUBMISSION DATE (15)				MONTH DAY YEAR				
YES (If yes, complete EXPECTED SUBMISSION DATE)															X NO								

ABS. JACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

Surveillance Test Procedure (STP) 170.014, Fire Switch Functional Test for XPP-0043B, CHG/SI Pump B, and 170.015, Fire Switch Functional Test for XPP-0043C, CHG/SI Pump C, are performed every 18 months and verifies the fire switch capability to isolate the "B" and "C" Train Charging (CHG)/Safety Injection (SI) pumps from their control circuitry in the control room. Part of the test involves actuating a relay that sends an emergency start signal to the "B" and "C" CHG/SI pumps as well as the "B" emergency diesel generator (EDG). Because the scope of these procedures does not involve starting the EDG, the procedure directs the EDG mode selector switch to be placed in the maintenance mode (this prevents the EDG from starting).

On August 4, 1991, during the performance of these STPs, the Operations crew had completed the functional requirements of the tests and was in the process of restoring the plant equipment from its test condition. The operator at the EDG was directed to restore the "B" EDG to "as found" conditions prior to the procedure step which called for the emergency start signal to be reset. This caused the EDG to start at approximately 2246 hours. The diesel generator was monitored and verified to achieve proper speed and voltage as required from an auto start. Also, all support systems were verified to function properly.

The operations staff was briefed on the necessity of attention to detail and the consequences which might ensue due to an error. Also, specific guidance to increase shift supervision's involvement with new or infrequently (six months or longer) performed tests will be implemented by April 1, 1992.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Virgil C. Summer Nuclear Station	0 5 0 0 0 3 9 5	9 1	0 0 6	0 0	0 2	OF 0 3	

TEXT (if more space is required, use additional NRC Form 366A's) (12)

PLANT IDENTIFICATION:

Westinghouse - Pressurized Water Reactor

EQUIPMENT IDENTIFICATION:

Emergency Diesel Generator, EIIS-DG

IDENTIFICATION OF EVENT:

A personnel error in procedure performance caused the inadvertent start of "B" train Emergency Diesel Generator.

EVENT TIME AND DATE:

August 4, 1991, at 02246 hours.

REPORT DATE:

September 3, 1991

This report was initiated by Off-Normal Occurrence Report 91-043.

CONDITIONS PRIOR TO EVENT:

Mode 1, 99% power.

DESCRIPTION OF EVENT:

Surveillance Test Procedure (STP) 170.014, Fire Switch Functional Test for XPP-0043B, CHG/SI Pump B, and 170.015, Fire Switch Functional Test for XPP-0043C, CHG/SI Pump C, is performed every 18 months and verifies the fire switch capability to isolate the "B" and "C" Train Charging (CHG)/Safety Injection (SI) pumps from their control circuitry in the control room. Part of the test involves actuating a relay that sends an emergency start signal to the "B" and "C" CHG/SI pumps as well as the "B" emergency diesel generator (EDG). Because the scope of these procedures does not involve starting the EDG, the procedure directs the EDG mode selector switch to be placed in the maintenance mode (this prevents the EDG from starting).

On August 4, 1991, during the performance of these STPs, the Operations crew had completed the functional requirements of these tests and the Control Room Supervisor (CRS) was in the process of coordinating the restoration of plant equipment from its test condition. The CRS's concerns throughout the test was focused on minimizing the time the EDG was inoperable. Thus, in an effort to restore the EDG, he reviewed the procedure but overlooked the step which directed him to reset the emergency start signal prior to restoring the EDG. Therefore, failing to realize that there was an emergency start signal present, he directed the operator to return the EDG to operable conditions. When the EDG mode selector switch was taken out of the "maintenance" position, at approximately 2246 hours, the EDG started due to the emergency start signal present. This start constitutes an inadvertent ESF actuation.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Virgil C. Summer Nuclear Station	0 1 6 1 0 1 0 1 3 9 1 5 9 1 1	--	0 1 0 1 6	--	0 1 0	0 1 3 OF 0 1 2	

TEXT (if more space is required, use additional NRC Form 380A 10/17)

The diesel generator was monitored and verified to achieve proper speed and voltage as required from an auto start. Also, all support systems were verified to function properly.

CAUSE OF EVENT:

The personnel error in directing the EDG be restored out of sequence with the procedure scheme caused the EDG to start inadvertently.

ANALYSIS OF EVENT:

The diesel generator was aligned to standby conditions with the exception of the mode selector switch and all support systems were operable. When the mode selector switch was taken out of the maintenance position, the diesel as well as all required support systems started normally. Therefore, no safety consequences occurred as a result of this event.

IMMEDIATE CORRECTIVE ACTION:

The diesel generator was immediately monitored to verify proper operation.

The diesel generator was then shut down and placed in standby per the applicable System Operating Procedure.

ADDITIONAL CORRECTIVE ACTION:

- 1) The control room supervisor was counseled on the importance of attention to detail and procedural compliance.
- 2) A review of this event will be implemented to identify if any procedural changes might enhance the performance of the involved STPs. This review will be completed by September 30, 1991 and any changes as a result of the review will be incorporated prior to the next scheduled test performance.
- 3) Operations management has discussed the need for attention to detail and the consequences of errors with all operating shifts.
- 4) As a result of the review of this event by the Management Review Board on August 30, 1991, specific guidance will be developed in an effort to increase the involvement of shift supervision in the review and performance of new or infrequently (six months or longer) performed tests. This guidance will be implemented by April 1, 1992.

PRIOR OCCURRENCES:

See LER 90-002.