

DEC 09 1991

ENCLOSURE 5

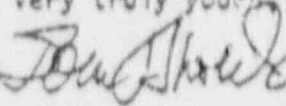
Mr. S. D. Ebner
U. S. Nuclear Regulatory Commission
Room 11, Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30323

Dear Mr. Ebner:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DUCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(NRC INSPECTION REPORT NO. 91-19)

South Carolina Electric & Gas Company (SCE&G) acknowledges receipt of the Systematic Assessment of Licensee Performance (SALP) Report No. 91-19, dated November 5, 1991, for Virgil C. Summer Nuclear Station, and appreciates the opportunity to discuss the content of the report in the November 14, 1991, meeting.

Attached are SCE&G's specific comments on the report. If you would like to discuss these items in more detail, please call us at your convenience.

Very truly yours,

John L. Skid

ARK:JLS:lcd
Attachment

c: O. W. Dixon Jr.
R. R. Mahan
R. J. White
General Managers
G. F. Wunder
J. B. Knotts Jr.
NSRC
NRC Resident Inspector
RTS (IE 911900)
File (815.01)

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

VIRGIL C. SUMNER NUCLEAR STATION
SALP REPORT COMMENTS

PLANT OPERATIONS

The weaknesses identified in regard to the valve control program and the fire protection program are of the programmatic nature for which enhancements either have been made or will be made.

RADIOLOGICAL CONTROLS

Our aggressiveness in achieving ALARA will result in being below the industry three year average for radiation exposure by the end of 1991.

There are two minor corrections to this section of the report. Paragraph 4 on page 6 addresses the number of ALARA suggestions made during this evaluation period and the previous evaluation period. The correct numbers are 39 for the previous period and 139 for this evaluation period.

MAINTENANCE/SURVEILLANCE

We are aggressively pursuing improvements in the area of post maintenance testing and have implemented portions of this new program during the recently completed refueling outage. We have also made enhancements to the preventive maintenance program to correct this identified weakness. In regard to the items concerning the number of personnel errors in the maintenance and surveillance areas, several corrective actions have been initiated. These actions appear to be effective, in that we have seen a reduction in personnel errors as evidenced through our internal assessments.

Finally, we have agreed to disagree on the issues concerning the Condensate Storage Tank (CST) failure. We believe that we did not make a nonconservative decision based upon the facts that were available at the time.

EMERGENCY PREPAREDNESS

We believe that significant improvements have been made in the Emergency Preparedness area during this evaluation period. The station emergency plan response personnel were involved in two major exercises during this SALP period, with only one NRC identified weakness. This weakness was identified in the first exercise. This weakness was addressed and programmatic changes were made which eliminated the concern during the second exercise. It should also be noted that the improvements to exercise performance, listed as examples in the report, were mostly identified by SCE&G personnel, thus demonstrating our ability to be self critical of emergency preparedness performance.

We are not satisfied with the performance of operators in classifying emergency conditions and are assessing program enhancements (i.e., standard EALs and intelligent software) to aid the operators. It should be noted that these performance problems attributed to training are not similar to those identified in the previous SALP report. In the previous report, there was a training administration problem that resulted in an individual missing his annual emergency planning qualification training. That problem was eliminated with changes to the training tracking system.

The siren system weakness was self identified. SCE&G has been aggressively pursuing the installation of a new system in order to fix the activation problems and enhance the overall reliability of the system. It is recognized that the possibility of the concern identified in the report exists, wherein the public could lose confidence in the current system. SCE&G is concerned about any complaints/concerns from the general public. These complaints/concerns have been addressed in a personal and straightforward fashion. The installation of the new system is currently in process, with the post modification testing scheduled to be completed in January 1992.

SCE&G recognizes the responsibilities in the Emergency Preparedness area and will continue to strive to accomplish improvements.

SECURITY

SCE&G has no specific comments in this area.

ENGINEERING/TECHNICAL SUPPORT

SCE&G believes that significant improvement has been accomplished in the area of Engineering/Technical Support during this evaluation period. Specific management attention has been focused on implementing improvements in the overall engineering function and in the day-to-day engineering support of the plant. We were disappointed that our efforts on Reliability Centered Maintenance program development were not acknowledged in the SALP report, even though the NRC has demonstrated a keen interest in the impact of maintenance on the safe operation of the plant.

We were also surprised by the negative comments on our performance on the Generic Fundamentals Exam. We knew that some of the individuals taking the exam were marginal, but we felt that they deserved the benefit of an independent view on the Generic Fundamentals Exam. In the past, go/no-go scrutiny has been reserved for our license applicants. Accordingly, we have not had a new license applicant ever fail a license exam. In the future, we will apply similar scrutiny to the Generic Fundamentals candidates. It should be noted that, although we were given a rating of "2" in this area, we have had no suggestions/recommendations in the previous two SALP reports.

SAFETY ASSESSMENT/QUALITY VERIFICATION

We are very pleased with the improved rating in this category from a previous SALP period of "2" to a rating of "1" in this most recent SALP period. This recognizes the considerable amount of effort of all NOD personnel to ensure that Virgil C. Summer Nuclear Station is operated in a safe manner.

We would like to offer three items of clarification on information contained in this section. The first is in regard to the "...older safety issues..." discussed in the last paragraph on page 18. The issues were categorized as "potential" safety issues through our review process and have received adequate attention based on the potential safety significance of the items. We are sensitive to the age of these items and are continuing to work to resolve them. The second item of clarification is in reference to the schedule for personnel to attend Senior Reactor Operator Certification Training as addressed in the first paragraph on page 19. This class is scheduled to commence in January 1992 as opposed to "the end of 1991." Finally, also in reference to the first paragraph on page 19, we would like to clarify that it is our intent to have certain key division managers obtain the Senior Reactor Operator certification or the Senior Reactor Operator license, but not necessarily all managers within the Nuclear Operations Division.