



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

January 22, 1992

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
SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 91-21

Attached is a supplement to the South Carolina Electric and Gas Company (SCE&G) response dated January 7, 1992. This supplement was requested by the NRC following a telephone conversation on January 16, 1992. If you should have any questions, please call at your convenience.

Very truly yours,

MO Quinton
John L. Skolds *for*

ARR:JLS:js
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 912101 and 912102)
File (815.01)

270100

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

9201280234 920122
PDR ADOCK 05000395
Q PDR

IE01
11

Violation Number 50-395/91-21-01

ITEM 2 - REMOVAL OF INSULATION

The inspection report provided 12 examples where insulation covering the contact surface between the supports and pipe was not removed during Inservice Inspection (ISI). SCE&G would like to provide clarification for these examples. Supports SWH-168 and SWH-1145 had insulation removed for the inspection (see enclosed data sheets); however, at the time the inspector performed his inspection, the insulation had been replaced. Supports SWH-163 and SWH-167 were scheduled for insulation removal; however, the supports were inadvertently inspected with insulation on part of the support. These supports have been rescheduled for inspection at the next refueling outage (RF7). For the remaining supports, SWH-154, 157, 159, 161, 169, 208, 209, and 210, SCE&G utilized the provisions of ASME Section XI, Paragraph IWF-1300e for inspection with insulation on part of the pipe support.

As mentioned in the telecon, SCE&G submitted an inquiry to the ASME Committee (dated January 16, 1992) requesting an interpretation to IWF-1300(e) to clarify the code requirement for removal of insulation on non-integral supports. The inquiry will be heard by the Committee the week of February 10. SCE&G will notify the NRC of the result of this inquiry. If SCE&G's interpretation is not supported by ASME, the current inspection procedures and plans will be revised and inspections of affected supports, with insulation removed, will be initiated.

Violation Number 50-395/91-21-02

The original response to the violation did not address SCE&G's current procedure for installation and maintenance of snubbers. SCE&G utilizes MMP-305.003, "Mechanical Snubber Maintenance - Removal-Reinstallation/Replacement," for new installation and maintenance of snubbers. Step 7.4.3 of this procedure does require verification of the clearance between spacers and spherical bearings. This procedure was provided to the NRC for consideration with respect to the violation.

Enclosure to Document Control Desk Letter
Violation Number 50-395/91-21-01 Item 2

SAB-501
ATTACHMENT 7

HWR Page _____ of _____

ADDITIONAL SHEET FOR SECTION

11

20 WORK

REQUEST NO.

910

10/2/91

Hanger No. SWH-163

LOCATION BLDG. 3B
ROOM NO. 1314

ELEVATION 4th

TRAIN 5

A. RWP NO. _____ Confined Space Entry Permit No. N/A

Scaffold Required ☐ Yes ☒ No Ladder Required ☒ Yes ☐ No
Insulation Removal Required ☒ Yes ☐ No

for Kell 9/19/90
Planner/Date

Shift Supervisor authorization to: (check required task)

☐ Erect Scaffold
☒ Remove Insulation
☒ Perform ISE Examination

R & R No. (if applicable) NA

TIME _____ LCO TIME _____

John Kell 9-19-90
Shift Supervisor/Date

C. Scaffold Erected, Insulation Removed and/or ladder ready (if applicable) for
ISE Examination.

John Kell 9-19-90
Job Supervisor/Date

D. As Applicable, Performed VT ISE Examination

Performed VT-3 Examination HCN _____, Pad _____, OWO _____, HWR _____

☒ Accept ☒ Reject

Q. C. Report No. VC51-4499-4499
382-5-1990

Performed VT-4 Examination

☒ Accept ☒ Reject HCN _____, Pad _____, OWO _____, HWR _____

Q. C. Report No. NA

John Kell 9-19-90
Q.C. Operator/Date

E. Insulation Installed, Scaffold Removed, ladder removed and/or P&R cleared
(if applicable)

John Kell 9-19-90
Job Supervisor/Date

F. REMARKS

154

Enclosure to Document Control Desk Letter
Violation Number 50-395/91-21-01 Item 2

SAP-101
ATTACHMENT 1

HWR Page _____ of _____

ADDITIONAL SHEET FOR SECTION

11

20 WORK
REQUEST NO.

91011010191111

Header No. SWH-1145

LOCATION BLDG. IB
ROOM NO. 12-12

ELEVATION 419 TRAIN A

A. RWP NO. _____ Confined Space Entry Permit No. N/A

Scaffold Required ☐ Yes ☒ No Ladder Required ☒ Yes ☐ No
Insulation Removal Required ☒ Yes ☐ No

Lowell 1/28/91
Planner/Date

B. Shift Supervisor authorization to: (check required task)

Y N
☐ ☒ Erect Scaffold
☒ ☐ Remove Insulation
☒ ☐ Perform ISE Examination

R & R No. (if applicable) N/A

TIME LCO TIME (HRS)

1/28/91
Shift Supervisor/Date

C. Scaffold Erected, Insulation Removal and/or Ladder ready (if applicable) for
ISE Examination.

1-28-91
Job Supervisor/Date

D. As Applicable, Performed VT ISE Examination

Performed VT-3 Examination RCM N/A, Pad N/A, OWO N/A, HWR N/A

☒ Accept ☒ Reject

Q. C. Report No. VCSU-4787

Performed VT-4 Examination

☒ Accept ☒ Reject RCM N/A, Pad N/A, OWO N/A, HWR N/A

Q. C. Report No. N/A

1-28-91
Q.C. Operator/Date

E. Insulation Installed, Scaffold Removed, Ladder removed and/or R&R cleared
(if applicable)

1-31-91
Job Supervisor/Date

F. Remarks

10.2

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