

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

84 MAY 24 A 9:20
May 18, 1984

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 84-08

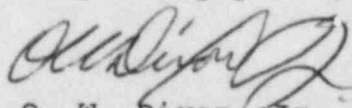
Dear Mr. O'Reilly:

Please find attached South Carolina Electric and Gas Company's response to the violation as addressed in Enclosure 1 of NRC inspection report 84-08.

Management has analyzed the examples constituting the violation individually to ensure specific corrective measures are established. Additionally, the examples were analyzed collectively to address potential generic trends of program implementation problems.

Measures have been initiated to project the importance of increased personnel awareness in the execution of the activities in order to make our program implementation more effective. This action will be complete by July 15, 1984.

Very truly yours,



O. W. Dixon, Jr.

HCF:OWD/dwf
Attachment

cc: V. C. Summer
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RESPONSE TO NOTICE OF VIOLATION
EXAMPLE I
INSPECTION REPORT 84-08

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the first example of the stated violation.

II. REASON FOR THE VIOLATION

The subject fire extinguisher is one of a group of fire extinguishers issued for use by maintenance personnel when fire watches are required during maintenance activities (i.e., welding, cutting, etc.). This particular fire extinguisher had not been inspected between the dates of September 1, 1983, and March 5, 1984, because of inadequate tracking.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The subject fire extinguisher was inspected and found to be acceptable. A subsequent walkdown inspection identified no other discrepancies.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The tracking process was improved by requiring the fire extinguishers to be tracked by a more in depth log book when they are issued for use. The modified log details the expiration date of the fire extinguishers to more readily detect an expired inspection condition. Also, the group responsible for issuing and controlling fire extinguishers from the Tool Room have received instructions which reinforce their responsibility and accountability for control of the subject fire extinguishers.

V. DATE OF FULL COMPLIANCE

The Licensee is in full compliance with the corrective action to this example of the violation.

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RESPONSE TO NOTICE OF VIOLATION
EXAMPLE II
INSPECTION REPORT 84-08

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the second example of the stated violation.

II. REASON FOR THE VIOLATION

On March 20, 1984, wall mounted fire extinguishers No. 34 and No. 37 were identified as not having received the required monthly inspection. The fire extinguisher inspection portion of the applicable Preventive Test Procedure (PTP) had been signed to indicate its completion on March 10, 1984. Procedural inadequacies resulted in fire brigade inspector oversight. The procedure required only a final signoff after the fire extinguisher inspection had been completed.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The subject extinguishers were inspected satisfactorily.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

PTP-114.002 is being revised to require an inspection sign-off for each fire extinguisher to more adequately identify potential discrepancies.

V. DATE OF FULL COMPLIANCE

The Licensee is in full compliance with the corrective action to this example of the violation. PTP-114.002 is presently in the review cycle and will be issued by July 1, 1984.

RESPONSE TO NOTICE OF VIOLATION
EXAMPLE III
INSPECTION REPORT 84-08

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the third example of the stated violation.

II. REASON FOR THE VIOLATION

An open quart can of motor oil was found unattended in a safety related area. The Licensee considered the oil to be within the scope of Fire Protection Procedure 003 (FPP-003), "Control of Transient Combustibles," because:

- (a) This particular quantity of oil was not required to be controlled by the transient combustibles permit.
- (b) The oil was located a safe distance of approximately 25 feet away from any safety-related equipment.
- (c) The oil was protected from ignition sources by a sprinkler suppression system.

It is acknowledged that the unattended container constituted poor housekeeping practice.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The oil was immediately removed from the safety related area.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The Licensee plans to revise FPP-003 to more adequately address low fire loading combustibles. Additionally, internal correspondence has been generated to increase the awareness of plant fire watch personnel to recognize and report poor housekeeping practice with respect to potential fire hazards.

V. DATE OF FULL COMPLIANCE

The Licensee is in full compliance with the corrective action to this example of the violation. FPP-003 will be revised by July 15, 1984.

RESPONSE TO NOTICE OF VIOLATION
EXAMPLE IV
INSPECTION REPORT 84-08

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the fourth example of the stated violation.

II. REASON FOR THE VIOLATION

The wooden storage box identified in the violation was of a medium fire loading which requires control via a transient combustible permit. Personnel oversight allowed the box to remain in the area. The Licensee considered the poly bottle of fuel oil identified to be within the scope of Fire Protection Procedure 003 (FPP-003) for the following reasons:

- (a) This particular quantity of fuel oil was of a low fire loading and was not required to be controlled by a transient combustible permit.
- (b) The fuel oil was protected from ignition sources by a sprinkler system.

However, the procedure will be revised to more clearly address combustibles in the low fire loading category. It is recognized that the unattended bottle constituted poor housekeeping practice.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Both the wooden storage box and the poly bottle of fuel oil were removed from the area. A subsequent walkdown revealed no other discrepancies.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The Licensee plans to revise FPP-003 to more adequately address low fire loading combustibles. Additionally, internal correspondence has been generated to increase the awareness of plant fire watch personnel to recognize and report poor housekeeping practice, with respect to potential fire hazards.

V. DATE OF FULL COMPLIANCE

The Licensee is in full compliance with the corrective action to this example of the violation. FPP-003 will be revised by July 15, 1984.

RESPONSE TO NOTICE OF VIOLATION
EXAMPLE V
INSPECTION REPORT 84-08

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the fifth example of the stated violation.

II. REASON FOR THE VIOLATION

The area where the welding was to be performed was located approximately six (6) feet below the 436' elevation deck grating of the Turbine Building. The welder had installed protective screens for that area. However, the material and the welding electrodes utilized for the welding operation required the welder to make local adjustments on the welding machine for proper heat (amperage) setting. The welder had left the work area to make the adjustment. The welder struck a test arc on a piece of scrap material while he was adjacent to the welding machine on the 436' elevation to verify the proper heat setting prior to returning to the work area. This was a momentary operation (approximately one minute). The welder then returned to the protective screened work area. The welder did not remember that he was outside the protective screen area when adjusting the welding machine. The wood scaffolding in question was of treated lumber (fire resistant). As such, it was not considered to be a combustible material and required no protective covering. Finally, the "actual" welding operation was performed below the 436' elevation and there were no open deck gratings below the work area. Hence, open deck grating protective coverings were not needed.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The welder and his supervisor were apprised of the situation in an effort to prevent recurrence.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

All welders and their assistants are required to review FPP-005, "Burn Permit."

V. DATE OF FULL COMPLIANCE

The Licensee is in full compliance with the corrective action to the violation. The required reading of FPP-005 will be performed by June 15, 1984.