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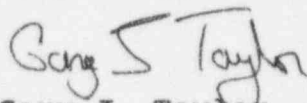
Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT NO. 50-395/95-15

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Level IV violation delineated in NRC Inspection Report No. 50-395/95-15. SCE&G is in agreement with the violation.

If there are any questions, please contact Mr. R. M. Fowlkes at (803) 345-4210.

Very truly yours,

  
Gary J. Taylor

cjm  
Attachment

c: J. L. Skolds  
O. W. Dixon  
R. R. Mahan (w/o attachment)  
R. J. White  
S. D. Ebnetter  
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RTS (IE 951504)  
File (815.01)

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REPLY TO A NOTICE OF VIOLATION  
VIOLATION NUMBER 50-395/95-15-04

I. RESTATEMENT OF VIOLATION

Technical Specifications 6.8.1.c requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Section 1.d of Appendix A, recommends administrative procedures for controlling procedure adherence.

Station Administrative Procedure, SAP-131A, Attachment I, Fire Detection Instrumentation, states in part, "As a minimum, the fire detection instrumentation for each fire detection zone shall be operable."

Contrary to the above, on August 14, 1995, the smoke detector, in room 12-18 of the auxiliary building, was rendered inoperable for a period of approximately 18 hours during which time no compensatory patrols were established.

II. STATEMENT OF POSITION

South Carolina Electric & Gas Company (SCE&G) is in agreement with the violation as stated.

III. REASON FOR THE VIOLATION

The fire detection system is in the process of being completely upgraded (approximately 70% complete) at the V. C. Summer Nuclear Station (VCSNS). As with any new system, there are problems with configuration, training, and human performance which must be addressed during the initial startup phase.

The unintentional bypass of this smoke detector occurred during the process of responding to multiple system alarms. The test technician apparently became confused during the performance of the test and accidentally bypassed the detector instead of clearing an alarm. A lack of technical knowledge and experience with the new system on the part of the test technician is considered to be the cause of the violation.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The detector bypass was found and removed approximately 18 hours after the surveillance test by an on-coming shift Fire Protection Officer (FPO). There was no impact to the plant from the inoperable condition of the detector.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

Following identification of the error by the FPO, plant management initiated a root cause analysis of the event to identify all factors which may have been contributors to the violation. While this investigation was being performed, test unit personnel were cautioned to carefully observe and question system indications during performance of their tests.

Specific actions being initiated as a result of this event are:

- A Technical Services Special Instruction issued on September 29, 1995, provides additional guidance on verification and acknowledgment of system conditions before and after surveillance testing.
- Test unit personnel and FPOs are currently receiving additional training on the operation of the fire detection system. This training will be completed by December 1, 1995.
- Engineering is discussing a possible change to the system software with the equipment supplier. The upgrade under discussion would prevent an inadvertent bypass of detectors at this level of system operation and provide an additional barrier to human performance errors. If implemented, this software change would be installed by February 1, 1996.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance by February 1, 1996.