

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

September 28, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Generic Letter 83-28, Section 2.2.2

Dear Mr. Denton:

On November 4, 1983, South Carolina Electric and Gas Company (SCE&G) provided a partial response to Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events." As stated in the previous letter, SCE&G was a member of the Nuclear Utility Task Action Committee (NUTAC) organized to address Section 2.2.2 of Generic Letter 83-28. SCE&G has now completed its review of the findings of this NUTAC and the final response to Generic Letter 83-28 is provided herein.

SCE&G understands that the intent of Section 2.2.2 of Generic Letter 83-28 was to increase the awareness of utilities concerning the technical information they receive from sources throughout the industry that could possibly affect the safety and reliability of safety-related components throughout their facilities. SCE&G believes that this information is important to the safe operation of the Virgil C. Summer Nuclear Station and has programs and procedures to ensure this information is reviewed for applicability to the plant. These procedures are presently undergoing review and revision, and any revisions should be complete by January 1985. Some of this information is received from vendors who supply equipment to SCE&G, and other data is received from the Nuclear Regulatory Commission (NRC), other regulatory agencies, other utilities, and utility sponsored groups and organizations.

SCE&G receives technical information from vendors pertaining to equipment they manufacture. Westinghouse, the NSSS supplier for the Virgil C. Summer Nuclear Station, has a technical bulletin system in place. This system requires acknowledgement of receipt of the bulletin by the utility plus the yearly issuance by Westinghouse of a listing of all technical bulletins issued. This listing allows SCE&G to reaffirm that all Technical Bulletins issued have been received. Periodically, information

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is received from other vendors which results from either voluntary submission by the vendor or a special request by SCE&G for information on a vendor product.

Such vendor information is distributed and tracked from a single organization within SCE&G. This group distributes the information in a timely manner to groups within the Nuclear Operations Department for review for applicability. These groups determine the impact of this information on the Virgil C. Summer Nuclear Station and document the review and any necessary required actions. This documentation is then returned to the organization charged with tracking the information and appropriately filed.

In some instances, as a result of the review, the vendor supplied information is incorporated into maintenance or operating procedures. In this case, the information is reviewed during each procedure review cycle. If, however, the material is deemed not applicable to the Virgil C. Summer Nuclear Station, or if present procedures adequately address the vendor information, the review is documented and filed.

Safety-related vendor services are performed under approved SCE&G Quality Services Procedures or SCE&G Quality Assurance (QA) approved vendor programs. Therefore, all appropriate vendor services are performed under QA guidance.

A great deal of information concerning equipment safety and reliability is received from sources other than vendors. For example, NRC Inspection and Enforcement Notices and Bulletins (INENs and IEBs) and Generic Letters have the potential of alerting utilities to possible equipment problems. SCE&G tracks and reviews these documents for applicability to the Virgil C. Summer Nuclear Station, and documents required actions resulting from these reviews.

One of the greatest sources of information dealing with equipment safety and reliability is utility sponsored organizations. These include various owners groups, and groups such as the Institute of Nuclear Power Operations (INPO). Owners groups, such as the Westinghouse Owners Group (WOG), allow the utilities to work together and to solve generic problems. SCE&G recognizes the importance of utility participation in these groups and is presently an active member of the WOG. INPO also coordinates

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various programs which provide utilities with information on the components found in nuclear power plants. SCE&G is presently participating in several of these programs.

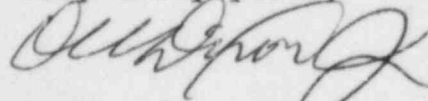
The Significant Event and Evaluation Information Network (SEE-IN) is one program managed by INPO in which SCE&G participates. This program compiles information from utilities and vendors and evaluates the impact of this information on nuclear plant operation. These evaluations are issued to the utilities in the form of Significant Event Reports (SERs) and Significant Operating Experience Reports (SOERs). SCE&G reviews these reports for information and applicability to the Virgil C. Summer Nuclear Station operation. These reviews determine whether problems could exist at the plant, and if so, what action is required to prevent the problems from occurring.

Another program, the Nuclear Plant Reliability Data System (NPRDS) compiles equipment data from participating utilities and makes it available to utilities and various other groups including the personnel conducting SEE-IN evaluations. SCE&G is actively participating in NPRDS. A partial data base has been submitted and SCE&G is currently compiling component engineering data for the remainder of the components in accordance with Revision 10 of the NPRDS Reporting Procedures Manual. This data base expansion is expected to be ready for submission by January 1985. NPRDS failure reports have been generated and submitted to INPO on a regular basis since May 1984.

As described above, SCE&G is implementing the administrative and procedural controls to help ensure that information received is reviewed for applicability and appropriately utilized. This program was designed to fulfill SCE&G's responsibility for complete, current and controlled maintenance of equipment technical information throughout the life of the plant.

If you have any questions, please contact us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

AMM/OWD/gj

cc: (see page #4)

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