

SOUTH CAROLINA ELECTRIC & GAS COMPANY
ATLANTA, GEORGIA
COLUMBIA, SOUTH CAROLINA 29218

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

84 NOV 6 A10:22
November 2, 1984

Mr. James P. O'Reilly
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street, N.W.
Atlanta, Georgia 30323

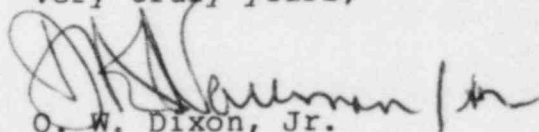
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violations
NRC Inspection Report 84-25

Dear Mr. O'Reilly:

Please find attached South Carolina Electric and Gas Company's response for the Violations as addressed in NRC Inspection Report 84-25.

If there are any questions, please call us at your convenience.

Very truly yours,


O. W. Dixon, Jr.

HCF:OWD/lcd
Attachment

cc: V. C. Summer
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E. H. Crews, Jr.
E. C. Roberts
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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 84-25

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the violation as stated.

II. REASON FOR THE VIOLATION

The Licensee is in the process of replacing the spent fuel storage racks with new racks of a higher density storage capability. In executing the modification, a management decision was made to perform a "dry" drag test on the new storage cells prior to installing them in the spent fuel pool. The "dry" drag test was intended only to provide an indication that the cells would be acceptable prior to their installation. Final acceptance testing was to be performed subsequent to installation. The Shift Supervisor and the responsible Maintenance Engineer jointly developed a temporary procedure to accomplish the "dry" drag test. Since the test results were not intended to satisfy any formal acceptance criteria, an unreviewed safety question evaluation was not conducted pursuant to 10CFR50.59(b). Preventive Test Procedure (PTP) 130.003 had been previously initiated to perform the post installation "wet" drag test. This procedure included the 10CFR50.59(b) unreviewed safety question evaluation.

The violation is due to personnel error. The criteria of 10CFR50.59(b) was not applied to the temporary procedure in its development.

III. ACTIONS TAKEN AND RESULTS ACHIEVED

When the use of the temporary procedure was questioned by the NRC Resident Inspector on August 26, 1984, plant management stopped the "dry" drag testing activity. It was then decided to formalize the pre-installation testing. General Test Procedure (GTP) 309 was initiated and approved on September 4, 1984 to perform the "dry" drag testing. PTP 130.003 was modified to integrate the results of GTP 309 as part of the acceptance criteria and was issued on September 24, 1984.

IV. CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

In order to prevent recurrence, the Licensee will take measures to increase personnel awareness in the area of procedural development requirements. This corrective action will apply to management personnel (including supervisors, engineers, etc.).

V. DATE OF FULL COMPLIANCE

This corrective action will be completed by January 31, 1985.

ENCLOSURE II
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 84-25

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the violation as stated.

II. REASON FOR THE VIOLATION

The "drag testing" being conducted was the same "dry" drag testing previously discussed in Enclosure I. The reason for this violation is the same as that stated in Enclosure I. The procedure being used during the testing was developed only to provide an indication that the new fuel storage cells would be acceptable prior to their installation in the spent fuel pool. The actual acceptance criteria was delineated in PTP 130.003 and included the calibration of the spent fuel bridge load cell (a measuring device).

III. ACTIONS TAKEN AND RESULTS ACHIEVED

The load cell was calibrated and found to be within acceptable tolerances.

IV. CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

In addition to the corrective action stated in Enclosure I, the Licensee will take measures to increase personnel awareness in the 10CFR50 Appendix B requirements for the use of measuring and test equipment associated with testing of safety related components, systems, and structures.

V. DATE OF FULL COMPLIANCE

The corrective action will be completed by January 31, 1985.

ENCLOSURE III
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 84-25

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company is in agreement with the violation as stated.

II. REASON FOR THE VIOLATION

The violation was due to an inadequate program governing crane operator training. The program failed to properly indicate which individuals were qualified to operate the Fuel Handling Building Crane. As a result, an operator without the proper qualifications was allowed to operate the Fuel Handling Building Crane. In addition, the operator failed to perform the required preoperational crane inspections.

III. ACTIONS TAKEN AND RESULTS ACHIEVED

When advised of the violation, the Manager of Operations placed a stop work order on the drag testing. The Supervisor of Operations initiated action to ensure that further crane operation was performed only by fully trained and qualified operators and that the required inspections were completed.

IV. CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

The Licensee has compiled a list of operators currently qualified for Fuel Handling Building Crane operation. This will ensure compliance for fuel handling activities during the present refueling outage.

Additionally, the responsibility for crane operator training has been reassigned to the Nuclear Technical Education and Training Group. This group is tasked with both upgrading and tracking of the crane operator training programs.

V. DATE OF FULL COMPLIANCE

This corrective action will be completed by January 31, 1985.