

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

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December 21, 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

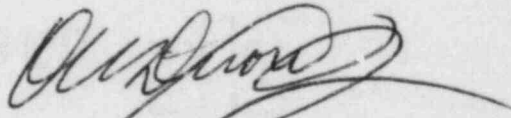
SUBJECT: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
Operating License No. NPF-12  
Response to Notice of Violation  
NRC Inspection Report 84-30

Dear Mr. O'Reilly:

Attached is South Carolina Electric and Gas Company's response for the Violation as addressed in Enclosure 1 of NRC Inspection Report 84-30.

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

Very truly yours,



O. W. Dixon, Jr.

CJM:OWD/lcd  
Attachment

cc: V. C. Summer  
T. C. Nichols, Jr./O. W. Dixon, Jr.  
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I & E (Washington)  
NPCF  
File

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ENCLOSURE 1  
RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT 84-30

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

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

II. REASON FOR THE VIOLATION

The violation of the locked valve control program, identified on October 29, 1984, is attributed to personnel error. The Virgil C. Summer Nuclear Station was shutdown on September 28, 1984, for a planned maintenance and refueling outage. During this outage, the Plant was in Mode 5 and systems such as Component Cooling required multiple danger tagging, valve alignments, and draining and venting evolutions for maintenance and testing of equipment. Technical Specification 3.7.3, "Component Cooling Water System," requires two (2) independent Component Cooling water loops for Modes 1, 2, 3, and 4. At the time of the violation, the system was capable of performing its required function of providing cooling water to the Residual Heat Removal System.

On October 13, 1984, the Component Cooling Heat Exchanger "B" Inlet (XVB-9508B) and Outlet (XVB-9509B) Valves were closed and danger tagged for performance of a relief valve test. A "Locked Valve Tracking Sheet" was filled out and placed in the tracking section of the Locked Valve Book in accordance with the requirements of Special Instruction (SI) 84-05, "Locked Valve Control," at the time of the valve isolations. The program requires Operations personnel to install the locking device and complete the SI 84-05 tracking sheet upon removal of danger tags and repositioning of the valves.

The placement and tracking of danger tags is controlled by Station Administrative Procedure (SAP) 201, "Danger Tagging." A component log sheet is filled out prior to the placement of danger tags and is used to track the position/status of equipment during maintenance. Step 6.6.9 of SAP-201 requires Operations personnel enter the normal operable position of the component as specified by the applicable System Operating Procedure (SOP). The log entry for the required operable position of XVB-9508B and XVB-9509B was listed as "Open" on the October 13 tag-out; whereas, SOP-118, "Component Cooling Water," requires the valve positions to be "Locked Open." When the danger tags were removed on October 16, 1984, the log sheet error caused the locked valve control program non-compliance. The operator who repositioned the valves was unaware that a Locked Valve Tracking Sheet was in the active file and that a locking device was required.

## ENCLOSURE 1 Continued

### II. REASON FOR THE VIOLATION - continued

The "similar violation" of the locked valve control program addressed in NRC Inspection Report No. 50-395/84-23 dated August 27, 1984, was attributed to a lack of program knowledge on the part of Chemistry personnel. The program was not followed in both violations; however, the root cause was not similar. The Licensee believes that the corrective actions addressed below, in addition to those provided in our response dated September 25, 1984, are adequate to preclude recurrence.

### III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A locking device was immediately installed on the Component Cooling Heat Exchanger valves after the NRC Resident Inspector identified the program violation. System function had not previously been impaired since the valves were in their correct position. A system valve alignment on November 28 and a locked valve audit on December 8 provides additional assurance of program compliance.

### IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The following corrective actions have been taken to prevent recurrence:

- 1) The response to this violation will be included in the required reading for Operations personnel. This action is expected to be complete by January 15, 1985.
- 2) A training program on procedural adherence and the locked valve control program is presently under development. Plant operator training is expected to be complete by January 31, 1985.

### V. DATE OF FULL COMPLIANCE

South Carolina Electric and Gas Company will be in full compliance by January 31, 1985.