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NOVEMBER 13, 1992

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO 50/395
OPERATING LICENSE NO. NPF-12
NRC INSPECTION REPORT NO. 50-395/92-17

Pursuant to the requirements of 10CFR2.201, South Carolina Electric & Gas Company (SCE&G) submits a response to the Notice of Violation enclosed to the subject NRC Inspection Report. SCE&G does not contest the alleged violation and submits a written reply as required by the aforementioned regulation.

Should you have any questions concerning this issue, please call Mr. Manuel W. Gutierrez at (803)345-4392 at your convenience.

Very truly yours,

Gary J. Taylor for
John L. Skolds *J. L. Skolds*

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RESPONSE TO NOTICE OF VIOLATION
VIOLATION NUMBER 50-395/92-17-01

I. RESTATEMENT OF VIOLATION

Appendix B, Criterion XI, of 10 CFR 50 requires that testing be performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above:

The acceptance criterion in the Motor Driven Emergency Feedwater (MDEFW) Pump Operability Test (STP 220.001A) for pump discharge pressure, was inappropriate from November 1989 until September 1992.

II. REASONS FOR THE VIOLATION

The following information provides a summary of the events leading to this Notice of Violation.

In January 1988, SCE&G completed an analysis in support of the Vantage 5 small break LOCA analysis. In the course of this analysis, SCE&G found that the existing surveillance test pressure for the MDEFW pumps needed to be changed from $\geq 1,350$ to $\geq 1,555$ psig in order to ensure that each MDEFW pump will supply the required design flow. In February 1988, a change to the acceptance criterion for the surveillance test pressure was recommended and implemented.

NRC Inspection Report No. 50-395/88-15, dated July 29, 1988, identified a deviation, Notice of Deviation (NOD) No. 50-395/88-15-02, concerning the Reactor Building Cooling Units (RBCUs) air flow being less than the FSAR requirements.

In response to the NOD, SCE&G committed to review Technical Specification (TS) surveillance values using tolerances that may affect the operation of safety related components, with the objective of ensuring that TS values are bounded by current analyses. The tolerances addressed in the evaluation included the Emergency Diesel Generator (EDG) voltage and frequency tolerances as they applied to components fed by the EDG. The review indicated that there were insignificant RBCU flow changes which did not invalidate the FSAR analysis, and the NOD was subsequently closed on March 30, 1989, via Inspection Report No. 50-395/89-07 dated May 23, 1989. The review also indicated that the acceptance criterion for the surveillance test pressure for the MDEFW pumps needed to be changed.

An SCE&G internal memorandum, dated March 31, 1989, recommended that administrative operational controls be imposed on the surveillance test acceptance criterion for the MDEFW pumps by increasing the surveillance test pressure to 1,600 psig. These recommended operational controls were not implemented and the existing administrative controls were not exercised.

SCE&G submitted to the NRC a Technical Specifications amendment request on September 8, 1992, to change the surveillance test pressure for the MDEFW pumps. The acceptance criterion of 1,600 psig for the MDEFW pumps was not included in the surveillance test procedure until September 1992.

The failure to adequately identify and incorporate the recommended changes in applicable surveillance test procedures in a timely manner is considered to be a personnel error.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Surveillance Test Procedure STP-220.001A, Motor Driven Emergency Feedwater Pump Test, was revised to change the minimum discharge pressure to 1,600 psig. The monthly surveillance tests for the month of November 1992 resulted in a discharge pressure of 1,690 psig for both A and B MDEFW pumps. Surveillance test records indicate that the MDEFW pumps have consistently performed at discharge pressures above the 1,600 psig at the specified flow.

IV. CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS AND DATE FOR FULL COMPLIANCE

SCE&G has processed and incorporated similar changes and has verified that these changes have been conducted within existing program requirements. SCE&G considers that existing programs are adequate. Additional training of engineering and licensing personnel has been performed to reinforce programmatic requirements.