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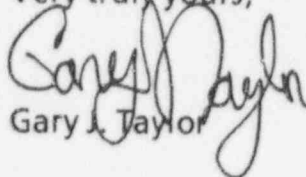
Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 96-02

Attached is the South Carolina Electric & Gas Company (SCE&G) response to the Notice of Violation delineated in the NRC Inspection Report No. 50-395/96-02. SCE&G is in agreement with the violation, and the enclosed response addresses the corrective actions being taken to prevent recurrence.

Should you have any questions, please call Mr. Jeffrey Pease of my staff at (803) 345-4124, at your convenience.

Very truly yours,



Gary J. Taylor

JWP/GJT/nkk
Attachment

c: J. L. Skolds
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A.R. Johnson
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RTS (IE 960201)
File (815.01)

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RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/96-02-01

I. RESTATEMENT OF NRC VIOLATION

Technical Specification 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.

Surveillance Test Procedure, STP-501.001, Battery Weekly Test, Revision 7, requires adjusting battery voltage as necessary if battery voltage is not 134.5 VDC (133 - 135).

Health Physics Procedure, HPP-158, Contamination Control for Areas, Equipment and Materials, Revision 6, requires that personal, hand-carried, or equipment type items used in clean areas of the Radiation Control Area (RCA) may be released as follows: Hand-carried items like flashlights, paperwork, or clipboards should normally be monitored in the N.E. SAM9.

Health Physics Procedure, HPP-819, Temporary Shielding Evaluation, Installation, and Removal, Revision 8, requires that all shielding has been evaluated and approved by the shift supervisor and that prior to installing any temporary shielding, verify that the prerequisites in the engineer's Technical Work Record (TWR) associated with the shielding package has been completed.

Contrary to the above,

1. On February 12, 1996, the technician performing the weekly battery test on the B train safety battery, failed to implement the procedure when the A train safety battery charger voltage was adjusted instead of the B train safety battery charger voltage.
2. On February 18, 1996, an auxiliary operator failed to monitor hand-held computer logging equipment in accordance with the contamination control procedure prior to releasing it from the RCA. The individual carried the equipment through the portal monitor at the RCA exit point instead of using the N.E. SAM9 tool monitor.
3. On March 5, 1996, Health Physics installed temporary shielding on Residual Heat Removal System and Safety Injection piping without first obtaining the shift supervisor's approval and without verifying that the TWR prerequisites were met.

II. STATEMENT OF POSITION

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

III. REASONS FOR THE VIOLATION

1. The cause of the first event was personnel error. The technician did not apply self checking to verify that the adjustment of the voltage was on the proper battery charger. A contributing factor to this event was that Operations personnel signed authorization to begin work on surveillance tests for both trains at the same time.
2. The cause of the second event is attributed to personnel error. The auxiliary operator did not understand that monitoring the hand-held computer equipment using the SAM9 tool monitor was required simply because he was holding it in his hand. HPP-158, "Contamination Control for Areas, Equipment and Materials" did not require use of the SAM9 for personal items such as radios, flashlights, and security guns provided they were worn through the portal monitor. The operator felt that the logging reader fit in that category. Had the logging equipment been worn in a belt holster through the portal monitor, the auxiliary operator would have been in compliance with HPP-158.
3. The cause of the third event was ineffective communication to the affected supervisory personnel of the change in methodology for installation of temporary shielding to accomplish on-line tasks.

IV. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

1. The technician involved in the first event was removed from shift until counseling was conducted. The individual was then returned to shift.
2. The Auxiliary Operator was instructed in the correct manner for removing hand-held equipment from the RCA by the Health Physics shift leader. The logging reader was properly monitored and released from the RCA.
3. The temporary shielding was removed and later reinstalled using the proper procedure.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

1. STP 501.001 was changed to require that prior to adjusting battery voltage the technician notify the Control Room that he/she will be adjusting the battery voltage and to identify the train and battery charger for which the adjustment will be made.

In addition, Operations personnel will no longer sign authorization for work on both trains at the same time.

2. HPP-158 was revised to further clarify items that require monitoring by the SAM9 and instructions reiterating the requirements have been posted at the RCA egress locations. This procedure revision has also been discussed with station operations and maintenance personnel.
3. Training on HPP-819 was held with appropriate Health Physics shift leaders and surveillance personnel to heighten their awareness of the recent changes in the temporary shielding program.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G considers itself to be in full compliance at this time.