



South Carolina Electric & Gas Company
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Vice President
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August 29, 1996
RC-96-0223

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

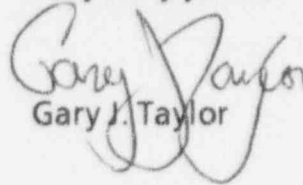
Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 96-08

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
R. R. Mahan (w/o attachment)
R. J. White
A.R. Johnson
S. D. Ebner
S. F. Fipps
NRC Resident Inspector

J. B. Knotts Jr.
K. R. Jackson
NSRC
DMS (RC-96-0223)
RTS (IE 960801)
File (815.01)

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PDR ADOCK 05000395
G PDR



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IE01
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RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/96-08-01

I. RESTATEMENT OF NRC VIOLATION

Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 1 of Appendix A to Regulatory Guide 1.33 states that the licensee should have administrative procedures.

Station Administrative Procedure, SAP-142, Station Housekeeping Program, revision 10, section 6.11, Designation of Storage Areas, requires that the originator of a Designated Storage Area Change Request shall ensure that all provisions, recommendations, or limitations identified in the attached Engineering review are complied with. Designated Storage Area Change Request Number 476 authorized storage of scaffold material between the two motor driven Emergency Feedwater (EFW) pumps. The seismic interaction analysis in the Engineering review attached to the storage request identified that to avoid possible seismic interactions with the EFW pumps a horizontal distance of 1 1/2 times the height of the scaffold stack must be maintained from the equipment.

Contrary to the above, on July 15, 1996, it was identified that scaffolding stacked in the designated scaffolding storage area between the two motor driven EFW pumps did not meet the Engineering review seismic interaction requirements in that the horizontal distance from B train EFW pump was less than 1 1/2 times the height of the scaffold stack.

II. STATEMENT OF POSITION

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

III. REASON FOR THE VIOLATION

The cause of this event is attributed to human error in that the personnel storing the scaffolding did not fully comprehend the instructions provided.

IV. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

All scaffolding was removed from this designated storage area within four hours of identification. Designated storage area change request number 476, which had approved this storage area was canceled.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

Management has reviewed the incident with the civil maintenance supervisors to heighten their awareness of compliance with engineering designated requirements for construction and storage of scaffolding equipment to prevent recurrence of this type of incident in the future.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

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