

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

35 MAY 14 P 1:35
May 10, 1985

Dr. J. Nelson Grace
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 85-11

Dear Dr. Grace:

Attached is South Carolina Electric and Gas Company's response for the Violation addressed in Enclosure 1 of NRC Inspection Report 85-11.

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
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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 85-11

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

Station Administrative Procedure (SAP) 141, "Control and Calibration of Measuring and Test Equipment (M&TE)," establishes the programmatic controls for Defective Precision Instrument Reports (DPIR). The failure to establish time constraints on DPIR evaluations with safety implications is attributed to personnel oversight during the preparation and review of SAP-141.

Factors which mitigate the consequences of this oversight are:

1. The M&TE program is based on hardware performance. Adverse trends in calibration drift or failures of M&TE are corrected by either replacement of the instrument or increasing the calibration frequency to prevent performance adverse to quality.
2. The initial reviews performed by the Instrument and Control technicians and their supervisor responsible for the research and preparation of DPIRs provide a means of early detection and corrective action for significant M&TE errors which potentially could impact the safety function of plant equipment.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Increased emphasis has been placed on the timely completion of DPIR reviews. On May 1, 1985, there were only 10 outstanding reports of greater than 3 months which had not been reviewed. The Licensee has not identified any M&TE error which impacted the safety function of plant equipment during these reviews.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The Licensee will review and revise SAP-141 to ensure that the duties and responsibilities relating to out-of-calibration M&TE are properly clarified. Additionally, a time constraint of 90 days for evaluation of DPIRs with potential for adverse impact on safety related equipment will be established in the revision.

V. DATE OF FULL COMPLIANCE

South Carolina Electric and Gas Company will be in full compliance by July 19, 1985.