

ENCLOSURE 1

NOTICE OF VIOLATION

South Carolina Electric and Gas Company
V. C. Summer

Docket No. 50-395
License No. NPF-12

The following violation was identified during an inspection conducted on May 13-17, 1985. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification (TS) 6.5.3.1.a requires procedures which affect nuclear safety and changes to such procedures to be reviewed and approved. Implicit in this requirement is that the review should be adequate to determine that the procedures contain appropriate steps and criteria to assure compliance with the licensing and other regulations intended for safe operation of the plant.

Contrary to the above, Surveillance Test Procedures (STPs) 150.001 and 123.003 did not receive an adequate review in that the respective procedures did not contain appropriate steps and criteria to assure compliance with licensing and other regulations. Deficiencies in the procedures are described below:

STP-150.001, Reactor Coolant System Leak Test

1. This procedure prescribes steps for performance of leak testing of reactor coolant pressure boundary components. TS 4.0.5 specifies this testing through reference to the requirements of the applicable code (hereafter the "Code") specified by 10 CFR 50.55(a)g - ASME Section XI (77S78). The procedure, which was used by the licensee in their 1984 refueling outage, does not comply with the Code in that it prescribes a test boundary that omits components required to be tested. Specifically,
 - It omits piping and valves beyond the first closed valve at the class boundary. The Code requires the test boundary to extend to the second of two closed valves. Examples of piping and valves incorrectly omitted are valves 8701A and B and the piping between these valves and valves 8702A and B.
 - It omits as boundaries, the flow restrictors which are identified as reactor coolant pressure boundaries in many small lines. For example, the flow restrictor in the 3/4 inch line at the Class 1 to Class 2A boundary at location A-15 on drawing E-302-691.
2. The procedure requires the performance of extensive visual examination for compliance with the Code. There are many components and locations to be examined for leakage - in effect, there are many individual

examinations. The procedure is deficient in that it does not provide a means to assure that examination points are not inadvertently bypassed. It does not identify the individual examination points and does not provide for sign-offs to assure verification of individual examinations or groupings of examinations related by close proximity.

3. The procedure is deficient in that it uses, "should" indicating permissiveness, where "shall" is appropriate for specifying certain requirements. For example, section 2.1 of the procedure states, "all requirements of the radiation work permit should be adhered to".
4. The procedure is deficient in that the acceptance criteria specified by it are not consistent with the requirements of TS 3.4.6.2.a and d, which permit no pressure boundary leakage and a maximum limit of ten gallons per minute of identified leakage.
5. The procedure is deficient in that it does not provide steps for verification of the operability of leakage detection systems, as required by subsection IWA-5243 of the Code.
6. The procedure requires entry into areas that may result in significant radiation exposures to individuals performing prescribed examinations. Detailed information regarding locations to be examined and how they may be accessed are needed to aid in assuring that proper locations are examined and that time is not spent by individuals unnecessarily making decisions under conditions of radiation exposure. The procedure is deficient in that it does not provide or reference such information, or require review of such information before entry into radiation areas.
7. The procedure is deficient in that it provides no verifications for required valve manipulations.

STP-123.003, Service Water System Valve Operability Test

This procedure provides steps for performance of valve testing required by the Code and valve testing performed to address concerns described in NRC Inspection and Enforcement Bulletin (IEB) 83-03. The procedure is deficient in that it does not contain acceptance criteria for the testing related to IEB 83-03.

This is a Severity Level IV violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

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Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

JUN 10 1985

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