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SOUTH CAROLINA ELECTRIC & GAS COMPANY

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

July 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

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SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 85-22

Dear Dr. Grace:

Attached is South Carolina Electric and Gas Company's response to the Violation as addressed in Enclosure 1 of NRC Inspection Report 85-22.

If there are any questions, please call us at your convenience.

Very truly yours,


O. W. Dixon, Jr.

RMF:OWD/lcd
Attachment

cc: V. C. Summer
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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 85-22

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

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

II. REASON FOR THE VIOLATION

The reason for the violation is attributed to inadequate procedure review. The Licensee considers this to be an isolated case due to the nature and scope of the procedure involved. Surveillance Test Procedure (STP)-150.001, "Reactor Coolant System (RCS) Leak Test," establishes the boundaries for leak testing of the entire RCS in accordance with Technical Specification Surveillance Requirement 4.0.5 and ASME Code Section XI. The inspector identified seven (7) deficiencies with respect to this procedure and leak testing of the RCS.

- 1) The procedure did not include piping and valves beyond the first closed valve at the end of the class boundary and omitted the flow restrictors which are identified as RCS pressure boundaries in many small lines.
- 2) The procedure did not provide a means to assure that examination points were not inadvertently bypassed.
- 3) The procedure uses "should" indicating permissiveness, where "shall" would be more appropriate for specifying requirements.
- 4) The procedure did not include acceptance criteria consistent with the requirements of Technical Specification 3.4.6.2(a) and (d).
- 5) The procedure does not provide steps for the verification of the operability of leakage detection systems required by subsection IWA-5243 of the Code.
- 6) The procedure does not include information regarding locations to be examined and how they are to be accessed to avoid unnecessary radiation exposure.
- 7) The procedure provides no verification for required valve manipulations.

Also identified as part of this violation was a deficiency in STP-123.003, "Service Water System Valve Operability Test." The procedure did not contain acceptance criteria for the testing of check valves included in the surveillance test to address the concerns of IEB 83-03.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

- 1) Action has been taken by the Licensee to include the boundaries in question into STP-150.001. The flow restrictors will be tested under STP-115.008.
- 2) Each test performer is required by SAP-134 to document the areas of the RCS for which he performed a VT-2 inspection. This should preclude an inadvertent bypassing of required test points.
- 3) The use of "should" will be deleted from the procedure.
- 4) Clarification of the acceptance criteria will be addressed in the next revision to STP-150.001. However, the purpose of this procedure is not to satisfy Technical Specification 3.4.6.2 but to satisfy the requirements of ASME Code Section XI per Technical Specification 4.0.5. Other surveillance test procedures address the requirements of Technical Specification 3.4.6.2.
- 5) The valve stem and vessel flange leakage collection systems are Code Class 2 or non-code class piping and as such are outside the scope of the requirements of this procedure. The pump seal leakage collection system has been previously included in STP-150.001.
- 6) Conduct of this test is under the provisions of the Radiation Work Permit program for specification of expected radiological conditions. The test is performed by qualified Operations personnel familiar with plant conditions, procedural requirements, plant systems, and the location of points to be examined. It is not the intent of this procedure to provide guidance to the extent that it could be performed by a person unfamiliar with plant procedures and systems.
- 7) The next revision of STP-150.001 will incorporate the valve position verification requirements.

In addition, STP-123.003 has been revised to include acceptance criteria for the testing of check valves in the service water supply to the diesel generators.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The Licensee has taken the following action to avoid further violation. Surveillance test procedures which address inservice inspection and code requirements will require the review of the ISI/Maintenance Engineering Group. The Licensee expects this action to provide the necessary review to ensure that the surveillance test program conforms with the applicable Code requirements.

V.

DATE OF FULL COMPLIANCE

SCE&G expects to be in full compliance with respect to the stated corrective action by August 15, 1985.