

ENCLOSURE 1

NOTICE OF VIOLATION

South Carolina Electric & Gas
V. C. Summer Nuclear Station

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 1-31, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. Technical Specification 4.8.1.1.2.f requires that each emergency diesel generator (EDG) shall be demonstrated operable each 184 day. This test requires the starting and accelerating of the EDG to synchronous speed with generator voltage and frequency at 7200 ± 720 volts and 60 ± 1.2 Hz within 10 seconds after the start signal. The generator shall be synchronized to its bus, then loaded to 4150-4250 kW within 60 seconds and operated for 60 minutes.

Amendment No. 50 of the TS reduced the frequency of fast start testing the EDGs from monthly to every 184 days. The safety evaluation for Amendment No. 50 states, in part, "...the requirement to fast load the DGs is maintained but on a reduced frequency of once per 184 days by inserting a new T.S. surveillance requirement 4.8.1.1.2.f to start and load the DGs from ambient conditions (fast start) within the time required for accident conditions."

Contrary to the above, on March 12, 1991, the 184 day surveillance test for the "A" EDG was not started from ambient conditions. STP 125.013, "Diesel Generator Semi-Annual Operability Test," requires the completion of the monthly test prior to initiating the semi-annual test without specifying sufficient time to allow the EDG to return to ambient conditions before the semi-annual test is initiated. This prerequisite resulted in starting the test from other than ambient conditions.

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

- B. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, which includes administrative procedures for equipment control.

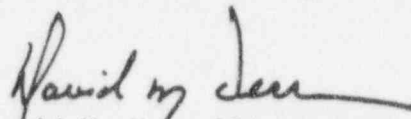
Station Administrative Procedure, SAP-201, "Danger Tagging" provides the requirements for isolation of equipment and realignment after the completion of maintenance.

Contrary to the above, the "Equipment Misalignment Status Log" was used to track a mispositioned valve (XVT 6436A) instead of "Danger Tagging" procedure SAP-201 during troubleshooting and repair of the "A" charging pump on March 21, 1991. The controls in OAP 105.2, "Equipment Misalignment Status Log" were inadequate to prevent operation of the charging pump during the maintenance run with chill water isolated from the pump (Valve XVT 6436A closed).

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, South Carolina Electric & Gas Co. is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, V. C. Summer Nuclear Station, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include (for each violation): (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION



David M. Verrelli, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Dated at Atlanta, Georgia
this 12th day of April 1991