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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 96-11

Attached is the South Carolina Electric & Gas (SCE&G) response to the Notice of Violation delineated in the NRC Inspection Report No. 50-395/96-11. SCE&G is in agreement with the violation, and the enclosed response addresses the reasons and corrective actions being taken to prevent recurrence.

Should you have any questions, please call at your convenience.

Very truly yours,



Gary J. Taylor

JWP/GJT
Attachment

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RESPONSE TO NOTICE OF VIOLATION
NUMBER 50-395/96011-04

I. RESTATEMENT OF NRC VIOLATION

10 CFR 50 Appendix B, Criterion XVI, Corrective Actions, as implemented by the licensee's quality assurance program. South Carolina Electric & Gas Company Operational Quality Assurance Plan, Revision 22, collectively require that for significant conditions adverse to quality, measures shall be implemented to assure that the cause of the condition is determined and corrective actions taken to preclude repetition.

Contrary to the above, a significant condition adverse to quality was identified on Non-conformance Notice (NCN) 5344, dated March 14, 1996, and corrective actions to preclude repetition were not accomplished. The significant adverse condition was a solenoid valve failure which resulted in an inoperable Train A Charging Pump. The licensee's determined cause was a design control error which installed an under rated valve for system conditions. Although the adverse condition was promptly corrected, the NCN did not provide corrective actions for the root cause, the design control error.

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 violation is attributed to a procedural inadequacy, in that Engineering Service Procedure (ES)-508, "Evaluation of Abnormal Conditions or Events", did not recognize a methodology for informing the evaluating engineer of the non-performance of recommended corrective actions.

The cause of the Design Problem identified by the NCN is attributed to procedural inadequacy, in that the Architect Engineer was not required to document design inputs to the level which is now required.

IV. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Engineering Services procedures have been revised to require that all design inputs for nuclear changes (modifications) be documented and verified. A design guideline has been written to provide a check list of design input categories. This guideline contains discipline specific considerations for each design input category. Nuclear change packages originated within SCE&G Design Engineering, as well as those originated by an outside source, are now required to contain the completed design input checklist. Materials and equipment specified for use in implementing a nuclear change must be procured in accordance with the applicable design inputs for that nuclear change.

V. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

1. ES-508 will be revised to require the evaluating engineer be informed of the non-performance of any recommended corrective action before the item can be considered closed.
2. Training will be held at the Architect Engineering company to heighten the awareness of the need to identify and meet all specification requirements when supplying replacement components.

VI. DATE FULL COMPLIANCE WILL BE ACHIEVED

SCE&G will be in full compliance by June 19, 1997.