

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

July 12, 1985 JUL 18 P 8:37

Dr. J. Nelson Grace  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II, Suite 2900  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

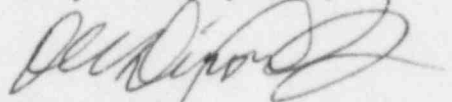
SUBJECT: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
Operating License No. NPF-12  
Response to Notice of Violation  
NRC Inspection Report 85-23

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 85-23.

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

Very truly yours,



O. W. Dixon, Jr.

MDB:OWD/csw  
Attachment

cc: V. C. Summer  
T. C. Nichols, Jr./O. W. Dixon, Jr.  
E. H. Crews, Jr.  
E. C. Roberts  
W. A. Williams, Jr.  
D. A. Nauman  
Group Managers  
O. S. Bradham  
C. A. Price  
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C. L. Ligon (NSRC)  
K. E. Nodland  
R. A. Stough  
G. Percival  
C. W. Hehl  
J. B. Knotts, Jr.  
S. D. Hogge  
I & E (Washington)  
NPCF  
File

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Response to Notice of Violation  
Inspection Report 85-23  
Violation 85-23-01

I. Admission or Denial of the Alleged Violation

South Carolina Electric and Gas Company (SCE&G) is in agreement with the violation in that the hanger conditions noted were not in conformance with design drawings.

II. Reason for the Violation

Records indicate the hangers noted in the violation (Hangers EFH-4010, CCH-153, SWH-4021) received their last inspection at the completion of construction of the Virgil C. Summer Nuclear Station per Construction Quality Control (QC) Instruction MF-9. Documentation of the construction inspections reflects acceptable installation of the three hangers. The deficiencies noted on Hanger EFH-4010 (cotter pin missing from the strut connection) and Hanger SWH-4021 (maximum angular tolerance was exceeded for one of the struts assembly installation) are not attributed to insufficient QC inspection. There is evidence that the cotter pin was installed and that the excessive angular tolerance of the strut was caused by pipe movement. The deficiency noted with Hanger CCH-153 (washers were missing for the four embedded anchor bolts) is considered an isolated event to which no specific cause can be attributed. Additional hanger inspections and a review of past inspections are described in Section III of this report.

III. Corrective Steps Taken and Results Achieved

The deficiencies noted with the NRC identified hangers were immediately corrected. An engineering evaluation of the deficiencies determined that the hangers were capable of performing their design function. Further, the Licensee initiated a random sample inspection of additional hangers. Of the 24 hangers inspected, three deficiencies were identified, corrected and evaluated for operability. Two of the three discrepancies did not affect the operability of the respective hangers. The third discrepancy would have prevented the hanger from performing its design function; however, the affected piping system would have remained operable.

The Licensee also reviewed the inspection reports on 140 hangers inspected during the 1984 Refueling Outage. Of the 140 inspected, one deficiency was identified and corrected at that time. The deficiency concerned a missing locking device. A thorough review indicates that upset threads may not have been visible to the inspector through paint. The hanger was disassembled, and a locking device appropriately applied before the thread upset could be verified. In either case, the deficiency would not have prevented the hanger from performing its design function. Of the 175 hangers evaluated, none of the deficiencies would have resulted in the loss of system function.

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III. Corrective Steps Taken and Results Achieved Cont.

Mechanical Maintenance Procedures (MMP) 200.00 and 305.004 were reviewed for adequacy in controlling the removal, reinstallation and inspection of pipe supports. A sample of the documentation associated with maintenance activities requiring hanger removal and replacement was found to be complete. These programmatic controls for pipe support removal, installation and inspection are considered adequate and being properly applied.

IV. Corrective Action Taken to Avoid Further Violation

The use of the formalized maintenance controls and the ongoing Inservice Inspection (ISI) program are considered adequate to assure the maintenance of hanger integrity. As a supplemental effort to provide additional program assurance of the continued adequacy of these formal programs, SCE&G is instructing QC personnel to observe the condition of hangers throughout the plant during routine housekeeping inspections.

V. Date of Full Compliance

SCE&G is in compliance with the corrective actions given above as of this date.