UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-395/85-38

Licensee: South Carolina Electric and Gas Company
Columbia, SC 29218

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

Facility Name: Summer

Inspection Conducted: September 30 - October 4, 1985

Inspector: M. F. Runyan 10/23/85
Date Signed

Approved by: G. A. Belisle, Acting Section Chief 10/23/85
Date Signed
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection entailed 33 inspector-hours on site in the areas of quality assurance (QA) program review, offsite support staff, and offsite review committee.

Results: No violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*H. Babb, General Manager, Nuclear Training
*W. Baehr, Manager, Corporate Health Physics and Environmental Programs
S. Bailey, Associate Manager, Procurement Engineering Group
J. Bannister, Senior Engineer, Construction
J. Barker, Senior Staff Health Physicist
A. Bashore, Site Manager, Construction
*O. Bradham, Director, Nuclear Plant Operations
*R. Clary, Manager, Nuclear Engineering
*M. Clonts, Assistant Site Manager, Construction
*S. Crumbo, QA Engineer
S. Cunningham, Associate Manager, Project Engineering
*H. Donnelly, Senior Licensing Engineer
T. Effinger, Associate Engineer, Nuclear Systems
T. Frady, Associate Manager, Procurement Systems
G. Higgenbotham, Associate Staff Health Physicist
S. Hunt, Associate Manager, Surveillance Systems
*A. Koon, Associate Manager, Regulatory Compliance
D. Lavigne, Manager, Nuclear Quality Control (QC)
F. Leach, Manager, QA
C. Ligon, Nuclear Safety Review Committee Secretary
G. Moffitt, Associate Manager, Columbia Engineering
B. Mullinax, Associate Manager, Nuclear Systems
*D. Nauman, Director, Nuclear Services
*K. Nettles, Group Manager, Technical Services
*A. Paglia, Manager, Nuclear Licensing
J. Proper, QA Supervisor, Operations
J. Todd, Structural Engineer
*D. Warner, Manager, Nuclear Fuel Management
*M. Whitaker, Group Manager, Regulatory and Support Services
*R. Whorton, Associate Manager, Licensing Systems
J. Woods, Group Manager, Construction

Other licensee employees contacted included office personnel.

Other Organizations

D. Grand, Electrical Engineer, Gilbert Commonwealth
*W. Williams, Special Assistant, Nuclear Operations, Santee Cooper

*Attended exit interview

NRC Resident Inspector

P. Hopkins

2. Exit Interview

The inspection scope and findings were summarized on October 4, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee.

Unresolved Item: Use of Telephone to Meet NSRC Quorum Requirements, paragraph 7.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. One new unresolved item identified during this inspection is discussed in paragraph 7.

5. QA Program Review (35701)

References:
(a) 10 CFR 50.54(a)(1), Conditions of Licenses
(b) FSAR Section 17.2, Quality Assurance During the Operations Phase
(c) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants

The inspector reviewed the licensee QA Program required by references (a) through (c) determine if these activities were conducted in accordance with regulatory requirements. The following criteria were used during this review to assess overall acceptability of the established program:

- Personnel responsible for preparing implementing procedures understood the significance of changes to these procedures.

- Licensee procedures were in conformance with the QA Program.

The QA program is described by Chapter 17 of the FSAR and is revised yearly. The following program changes made in the 1984 and 1985 submittals were randomly selected to determine whether the changes were fully implemented:

Organizational changes were made as described in Figure 17.2-1 of the FSAR. In the 1983 program, the Quality Control Systems Group was in an ad hoc status located off site. In the 1985 program, the group was made permanent and located on site. Several title changes were also made.

In the 1983 program, Section 17.2.2 stated that the QA program would be applied to certain non-safety-related activities, termed "quality-related." The 1985 program stated that "Quality Related Plans" will be generated to cover these activities which, in the interim, will still be subject to the QA program.

In the 1983 program, the Director of Station QC was responsible for receiving inspection services. The 1985 program assigns this responsibility to the Associate Manager, QC Systems.

The 1983 program states that the Assistant Manager, Maintenance Services, is responsible for scheduling and planning work. The 1985 program assigns this responsibility to Scheduling and Outage Management.

Through interviews with personnel and the examination of documents provided by the licensee, the inspector determined that the above QA Program changes were fully implemented.

The procedures discussed in this report were reviewed to determined conformance with the QA Program. The inspector reviewed QA Program implementation as a part of the inspection. Each specific area is detailed in other paragraphs of this report. Problem areas, if identified, are detailed in the specific area inspected.

6. Offsite Support Staff (40703)

References:
(a) 10 CFR 50.54(a)(1), Conditions of Licenses
(b) FSAR Section 17.2, Quality Assurance During the Operations Phase
(c) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
(d) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)
(e) ANSI N18.7 - 1976, Quality Assurance for the Operational Phase of Nuclear Power Plants
(f) Technical Specifications, Section 6, Administrative Controls

The inspector visited the corporate office to determine whether the offsite support staff functions are performed by qualified personnel in accordance with licensee approved administrative controls, regulatory requirements, and industry guides and standards. The following criteria were used during this review to assess the adequacy of the offsite staff:

- Administrative controls were established to assign departmental responsibilities, authorities, and lines of communication in conformance with the requirements of 10 CFR 50, Appendix B, and the licensee's approved QA program.

- Managers, group leaders, and staff members understood their responsibilities and authorities.

- The above personnel were qualified for their related work.

- Quality assurance audits of offsite support staff activities were conducted satisfactorily and corrective actions for identified deficiencies were completed in a timely manner.

The documents listed below were reviewed to determine if the previously listed criteria had been incorporated into the licensee's offsite support staff operation.

SCE&G Operational Quality Assurance Plan
- Section 2 Organization and Responsibilities
- Section 3 Administrative Controls

AI-401 Quality Assurance Activities, Revision 0
AI-404 QA Personnel Assignment and Administration, Revision 0
AI-407 Documentation of Technical Personnel Training and Qualification, Revision 1

Technical Services Procedures, Nuclear Operations Department
- TS-100 Nuclear Engineering Organizational Responsibilities, Revision 2
- TS-101 Personnel and Indoctrination/Training Program, Revision 1

Management Directives Manual, Revision 19
- Statement of Responsibilities
  - Quality Services Group, Revision 3
  - Nuclear Services Group, Revision 4
  - Procurement Engineering Group, Revision 0

Organizational Structure, Nuclear Operations Department, Revision 3

Technical Policy Statements, Nuclear Services Division, Revision 0

Corporate Health Physics Procedures

- CHP-102 Personnel Indoctrination/Training Program, Revision 1
- CHP-106 Organizational Structure, Responsibilities and Duties, Revision 1
- CHP-206 Interfacing Procedure for Corporate Health Physics, Revision 1

The inspector interviewed the following SCE&G personnel:

Design Engineering

- R. Clary, Manager, Nuclear Engineering
- G. Moffitt, Associate Manager, Columbia Engineering
- S. Cunningham, Associate Manager, Project Engineering
- J. Todd, Structural Engineer

Procurement Engineering

- R. Clary, Manager, Nuclear Engineering
- S. Bailey, Associate Manager, Procurement Engineering Group
- D. Grand, Electrical Engineer, Procurement Engineering Group

Construction

- J. Woods, Group Manager, Construction
- A. Bashore, Site Manager, Construction
- M. Clonts, Assistant Site Manager, Construction
- J. Bannister, Senior Engineer, Construction

Quality Assurance

- F. Leach, Manager, QA
- T. Frady, Associate Manager, Procurement Systems
- S. Crumbo, QA Engineer

Nuclear Fuels Management

- D. Warner, Manager, Nuclear Fuels Management
- B. Mullinax, Associate Manager, Nuclear Systems
- T. Effinger, Associate Engineer, Nuclear Systems

Health Physics and Environmental Programs

W. Baehr, Manager, Corporate Health Physics and Environmental Programs
J. Barker, Senior Staff Health Physicist
G. Higgenbotham, Associate Staff Health Physicist

A large percentage of the corporate staff is located on site. Several groups are almost evenly divided between onsite and offsite job locations and employees are often shifted between the two. This appears to be a beneficial policy, promoting efficiency, quality, and morale. It allows the corporate staff to perform their support function in a direct fashion.

The interviews referenced above were performed to assess the administration, indoctrination, and training of the corporate staff. All employees appeared to understand their responsibilities and authorities and could identify the documents which delineate this information. These documents provided a high degree of detail pertaining to organizational and administrative affairs.

All employees had received some form of training. This training consisted of classroom instruction, technical school and simulator training, required reading lists, and on-the-job training. Though the primary emphasis was on new employees, some refresher training was conducted.

The majority of the technical staff are degreed engineers. A smaller, but significant, percentage are registered as professional engineers. The licensee encourages professional registration as a means of advancement in the organization.

The offsite support staff appeared to interface satisfactorily with the onsite staff. Offsite personnel located in the corporate office routinely visited the site to coordinate their work. Various departments and divisions within the corporate office appeared to communicate well and deliver a coordinated work effort.

The responsibility to audit offsite support staff functions was shifted approximately one year ago from corporate to onsite QA. The following audits of the offsite support staff were reviewed:

II-28-84-M, Environmental Surveillance Program, Environmental Surveillance/Monitoring Group, October 29 - November 2, 1984

II-2-85-G, Nuclear Services - Technical Services, January 28 - February 8, 1985

II-23-85-K, Purchasing Activities, August 21 - 22, 1985

Audit findings were significant in scope and depth, and corrective action for identified deficiencies was timely and well documented.

Within this area, no violations or deviations were identified.

7. Offsite Review Committee (40701)

References:
(a) 10 CFR 50.54(a)(1), Conditions of Licenses
(b) FSAR Section 17.2, Quality Assurance During the Operations Phase
(c) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
(d) Technical Specifications, Section 6.5.2, Nuclear Safety Review Committee (NSRC)
(e) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)
(f) ANSI N18.7-1976, Quality Assurance for the Operational Phase of Nuclear Power Plants

The inspector reviewed the licersee's offsite review committee, the Nuclear Safety Review Committee (NSRC), required by references (a) through (f) to determine if the committee was in conformance with regulatory requirements, industry guides and standards, and the technical specifications (TS). The following criteria were used during this review to assess the overall acceptability of the established program:

- The NSRC membership and qualifications were as required by the TS
- The NSRC held meetings at the required frequency with the required quorum.
- The NSRC reviewed those items specified in the TS.
- The NSRC had cognizance of audits performed in the areas specified by the TS.
- NSRC meeting minutes were prepared and issued within the required timeframes.

The document listed below was reviewed to determine if the previous listed criteria had been incorporated into the licensee's NSRC charter:

Management Directive: State of Responsibilities, Nuclear Safety Review Committee, Number 6, Revision 4

The inspector reviewed the completed minutes resulting from the following meetings:

NSRC Meeting No.	Date of Meeting
83-05-S1	August 16 - 17, 1983
83-05	September 20, 1983
83-06-S1	September 30, 1983
83-06	November 15, 1983

84-01-S1	December 7, 1983
84-01	January 17, 1984
84-02-S1	January 30, 1984
84-02-S2	February 21, 1984
84-02	March 20, 1984
84-03-S1	March 28 - 29, 1984
84-03-S2	April 24 - 25, 1984
84-03	May 22, 1984
84-04-S1	June 19, 1984
84-04	July 17, 1984
84-05-S1	August 23, 1984
84-05	September 25, 1984
84-06-S1	November 29, 1984
84-06	December 11, 1984
85-01-S1	March 4, 1985
85-01	March 12, 1985
85-02-S1	April 9, 1985
85-02-S2	April 26, 1985
85-02-S3	May 15, 1985
85-02-S4	June 7, 1985
85-02	June 18, 1985
85-03-S1	August 1, 1985
85-03-S2	August 30, 1985
85-03	September 17, 1985

Meeting numbers designated with an "S" were special meetings called to review a specific issue.

An SGE&G inter-office correspondence dated November 1, 1983, lists 11 full-time members of the NSRC and 8 alternate members. The inspector reviewed the resume files for full-time and alternate members to determine whether the NSRC possessed expertise in review areas required by TS. All areas except chemistry/radiochemistry were well-covered by the staff's educational and experimental background. In the area of chemistry and radiochemistry, one full-time and one alternate member had limited experience, though not meeting the level required by the TS. A violation is not warranted because the TS requires the NSRC to have expertise in only a majority of the eight areas listed. However, the NSRC would be expected to employ a consultant in the event of a review involving a highly technical chemistry or radiochemistry issue.

It was evident from the meeting minutes that all review areas required by the TS were being reviewed. Review items were regularly sent to the NSRC at least one week prior to the meetings and within several weeks after they had been reviewed by the Plant Safety Review Committee. This kept reviews current and prevented backlogs.

The NSRC is required by the TS to have cognizance of audits performed in certain areas. Committee members were individually assigned areas and were responsible for giving periodic "shepherd's reports" summarizing all associated audit activities.

The constitution of the meetings reviewed met quorum requirements. Meetings were held routinely more often than the requirement of once per six months.

Within this area, one unresolved item was identified. The NSRC often calls special meetings on short notice usually to approve a change to the TS. It has been the practice of the NSRC, on occasion, to conduct individual special meetings by telephone conversations in lieu of assembling a quorum in one location. Meetings 83-05-S1, 84-03-S1, and 84-03-S2, among others, used telephone conversations to meet quorum requirements. The issue is whether meetings conducted in this manner satisfy the intent of the quorum requirements specified in the TS. Pending further review by NRC, this item will be identified as Unresolved Item 395/85-38-01: Use of Telephone to Meet NSRC Quorum Requirements. The licensee is not required to respond to this issue at this time.