

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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

August 20, 1985 5 AUG 26 A10:04

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

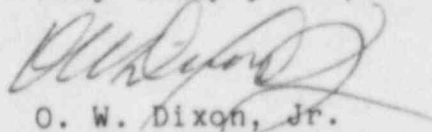
SUBJECT: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
Operating License No. NPF-12  
Response to Notice of Violation  
NRC Inspection Report 85-28

Dear Dr. Grace:

South Carolina Electric and Gas Company (SCE&G) is in agreement with the alleged violation 85-28-01 as stated in Inspection Report No. 50-395/85-28. The inspection report adequately describes the circumstances of the violation. The Licensee's corrective actions taken to avoid further violation have been addressed in LER 85-015, Revision 1 (see Attachment I). In addition, the Licensee has reemphasized to all Shift Supervisors the importance of a conservative approach to equipment operability during surveillance testing and preventive maintenance activities, i.e., if these activities place equipment in a status of questionable operability, the equipment is to be considered inoperable.

SCE&G is in full compliance with respect to the stated corrective action.

Very truly yours,


  
O. W. Dixon, Jr.

RMF:OWD/lcd  
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  
S. R. Hunt

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

8509050199 850820  
PDR ADOCK 05000395  
Q PDR

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LICENSEE EVENT REPORT (LER)  
ATTACHMENT I

FACILITY NAME (1) <b>Virgil C. Summer Nuclear Station</b>										DOCKET NUMBER (2) <b>0   5   0   0   0   3   9   5   1   OF   0   2</b>										PAGE (3) <b>1</b>							
TITLE (4) <b>Inoperability of Residual Heat Removal (RHR) System</b>																											
EVENT DATE (5)				LER NUMBER (6)				REPORT DATE (7)				OTHER FACILITIES INVOLVED (8)															
MONTH		DAY		YEAR		YEAR		SEQUENTIAL NUMBER		REVISION NUMBER		MONTH		DAY		YEAR		FACILITY NAMES						DOCKET NUMBER(S)			
																								0   5   0   0   0			
0   6		1   1		8   5		8   5		-   0   1		5   -   0   1		0   1		0   7		1   7		8   5								0   5   0   0   0	
OPERATING MODE (9)				THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)																							
1				20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)											
POWER LEVEL (10)				20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(v)				73.71(c)											
1   0   0				20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)											
				20.405(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)															
				20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)															
				20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)															
LICENSEE CONTACT FOR THIS LER (12)																											
NAME														TELEPHONE NUMBER													
A. R. Koon, Jr., Assoc. Mgr., Regulatory Compliance														7   8   0   3   3   4   5   -   5   2   0   9													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																											
CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPDOS		CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPDOS									
SUPPLEMENTAL REPORT EXPECTED (14)														EXPECTED SUBMISSION DATE (15)		MONTH		DAY		YEAR							
YES (If yes, complete EXPECTED SUBMISSION DATE)														X NO													
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																											

On June 11, 1985, due to personnel error, both trains of the RHR System were declared inoperable concurrently. At 0710 hours, the "A" Train RHR pump was declared inoperable because of the installation of non-seismic scaffolding to support inservice inspection. At approximately 0830 hours, the Shift Supervisor approved performance of surveillance testing of Train "B" Reactor Trip Breaker and Safety Injection (SI) Time Delay (STP-345.076). This test disabled actuation of the Train "B" Load Sequencer, and as such, RHR pump B was inoperable during testing activity.

There were no adverse consequences due to this event. Though the "A" train pump was "Administratively" inoperable, the unit would have started on a valid signal. Also, testing activity of the "B" train could have been terminated and the system returned to operable status if required.

This event was discussed in detail with the responsible Shift Supervisor, and it was reemphasized that the determination of equipment operability must include consideration of seismic qualification.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Virgil C. Summer Nuclear Station	0 5 0 0 0 3 9 5 8 5	—	0 1 5	—	0 1	0 2	OF 0 2

TEXT (If more space is required, use additional NRC Form 366A's) (17)

On June 11, 1985, both trains of the RHR system were declared inoperable concurrently. At 0710 hours, the "A" Train RHR pump was declared inoperable because of the installation of non-seismic scaffolding to support inservice inspection. At approximately 0830 hours, the Shift Supervisor approved performance of surveillance testing of Train "B" Reactor Trip Breaker and Safety Injection (SI) Time Delay (STP-345.076). This test disabled actuation of the Train "B" Load Sequencer, and as such, RHR pump B was inoperable during testing activity.

Testing was performed from 0850 hours to 1047 hours and from 1314 hours to 1418 hours. During the morning test, the technicians encountered a recorder problem and the system was restored to operable status while the recorder was being repaired. As a result of the aforementioned testing, both RHR trains were inoperable concurrently for a period of 1 hour 57 minutes and 1 hour 4 minutes respectively.

This event was due to a personnel error. The Shift Supervisor was aware that the surveillance test (STP-345.076) was in the extension period as allowed by the Technical Specification. Prior to approval to perform the surveillance test, the Shift Supervisor reviewed the status of the "A" Train and considered the "A" RHR pump to be operable for the purpose of surveillance testing on the "B" Train.

There were no adverse consequences due to this event. Administratively, the "A" Train RHR pump was inoperable; however, the unit would have responded to a valid (SI) signal. In addition, testing of the "B" Train could have been terminated and the system restored to operable status if required.

This event was discussed in detail with the responsible Shift Supervisor, and it was reemphasized that the determination of equipment operability must include consideration of seismic qualification.

In addition, effective June 17, 1985, a "by train" maintenance/testing concept has been established which utilizes the philosophy of scheduling maintenance and testing on only one train during any given week.