



South Carolina Electric & Gas Company
P.O. Box 764
Columbia, SC 29218
(803) 748-3513

DAN B
Dan A. Nauman
Vice President
Nuclear Operations

November 27, 1985

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

85 DEC 2 P 1:57

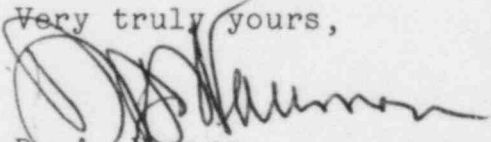
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Response to Notice of Violation
NRC Inspection Report 85-37

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 85-37.

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

Very truly yours,



D. A. Nauman

RMF:DAN/dwf
Attachment

cc: V. C. Summer
T. C. Nichols, Jr./O. W. Dixon, Jr.
E. H. Crews, Jr.
E. C. Roberts
W. A. Williams, Jr.
Group Managers
O. S. Bradham
C. A. Price
S. R. Hunt

C. L. Ligon (NSRC)
K. E. Nodland
R. A. Stough
G. Percival
R. L. Prevatte
J. B. Knotts, Jr.
S. D. Hogge
I & E (Washington)
NPCF
File

8512100282 851127
PDR ADOCK 05000395
Q PDR

IECI

ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 85-37

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

South Carolina Electric and Gas Company (SCE&G) is in agreement with the alleged violation as stated below and as discussed in NRC Audit Report No. 50-395/85-37.

II. REASON FOR THE VIOLATION

The reason for the violation is attributed to three causes:

- 1) Probable failure of the check valves in the air supply line to properly seat and maintain the air accumulator pressure for the active side of the Feedwater Isolation Valve following isolation of air to the valve.
- 2) Failure to address adequately isolation of the air supply to the Feedwater Isolation Valve in the Nonconformance Notice (NCN) disposition.
- 3) Failure to implement adequately the NCN disposition in performing the desired isolation.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Following the Reactor Trip on September 20, 1985 and the failure of the Feedwater Isolation Valve to close on a Feedwater Isolation Signal, immediate action was taken to restore instrument air to the valve and close it. The hydraulic leak on the inactive side of the valve was repaired; the valve was stroke tested and returned to service prior to plant restart.

The Licensee evaluated the performance of the check valves in the instrument air supply lines with respect to NRC Information Notice 85-35. An interim plan of action was established to address valve operability until the check valves could be replaced. This evaluation included justification for continued operation if the following conditions were met:

- 1) Instrument air to the Feedwater Isolation Valve would not be isolated without declaring the valve inoperable.

- 2) The Feedwater Isolation Valve would be considered inoperable if pressure in the Instrument Air System decreased below 80 psig, and
- 3) If the plant tripped with a Loss of Instrument Air condition, the Feedwater Isolation Valves would be immediately closed.

IV. CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The Licensee's Technical Services personnel have been instructed to include clear and concise instructions within NCN dispositions which specify unique or "one time" operator actions to place components, devices, systems, etc. in an acceptable configuration to satisfy design basis requirements. This instruction will be included in the appropriate procedure governing Technical Services activities with respect to NCN dispositions.

The check valves located in the air supply lines to the Feedwater Isolation Valves are to be replaced during the current refueling outage. In addition, a modification has been generated to add pressure gauges to directly monitor air reservoir pressure for the Feedwater Isolation Valves. This modification is planned for implementation during the current refueling outage.

Training will be conducted for the appropriate personnel to address limitations, controls, and interfaces for programs governing modifications, maintenance activities, and nonconformance notices. Emphasis will be placed on each group's responsibility and accountability in implementing their respective portions of each program.

V. DATE OF COMPLIANCE

South Carolina Electric and Gas Company expects to be in full compliance with respect to the stated corrective action by July 1, 1986. All corrective action with the exception of personnel training should be complete prior to January 1, 1986.