

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 20, 1979

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 990/112779
PO/RMT:baw
Docket No. 50-280
50-281
License No. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of November 27, 1979 in reference to the inspection conducted at Surry Power Station Unit Nos. 1 and 2 on October 17-19, 1979 and reported in IE Inspection Report Nos 50-280/79-61 and 50-281/79-80. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure.

Very truly yours,

C. M. Stallings

C. M. Stallings
Vice President-Power Supply
and Production Operations

Attachment

cc: Mr. Albert Schwencer

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RESPONSE TO
IE INSPECTION REPORT NOS. 50-280/79-61 AND
50-281/79-80

NRC COMMENT: (Appendix A)

As required by Section 3.21.G of the Technical Specifications, all penetration fire barriers protecting safety-related areas shall be functional at all times. In the event a penetration fire barrier becomes non-functional, a continuous fire watch must be established on at least one side of the affected penetration within one hour.

Contrary to the above, the fire door that controls the opening between the Unit 1 and Unit 2 Switchgear rooms at the 9'-6" elevation was found inoperative due to a 4160 volt transformer being stored in door opening which would not permit the door to close in the event of a fire and a continuous fire watch had not been established.

This is an infraction.

RESPONSE:

The violation is correct as stated.

1. Corrective steps which have been taken.
 - a. Transformer has been removed.
2. Corrective steps taken to avoid further infraction.
 - a. Memorandum from Station Manager sent to all plant superintendents and contractors to be aware not to block fire doors.
 - b. Area to be checked more frequently to ensure there are no obstructions.
3. Date when full compliance will be achieved.
 - a. Full compliance has been achieved.

NRC COMMENT: (Appendix B)

- A. Section IV.E.5 of the Fire Protection System Review for Surry Power Station of July 1, 1977 states that the carbon dioxide fire protection systems at the plant meet the provisions of National Fire Protection Association (NFPA) Standard 12, "Carbon Dioxide Systems". Sections 1.8.3.4 and 1-9.1.3 of NFPA-12 require a manual control station for actuation of the system to be located within the protected area. The manual control station must be capable of activating the bank of carbon dioxide cylinders that are in service.
Contrary to the above, the manual activation control device for the combination automatic and manual actuated carbon dioxide system protecting the diesel fuel tank room at the service water intake structure is arranged to only activate the main bank of cylinders.

NRC COMMENT (Appendix B) (continued)

With the main bank of cylinders removed for recharge or repair, it is not possible to activate the reserve supply from the manual station within the fuel tank room.

This is a Deviation.

RESPONSE:

The violation is correct as stated.

1. Corrective steps which have been taken.
 - a. Main bank of cylinders has been replaced negating need for reserve supply.
2. Corrective steps taken to avoid further deviation.
 - a. Main bank CO₂ bottles will remain in service until a design change can be made. A design change has been submitted to insure activation capability of the reserve supply in the event the main bank is rendered inoperative.
3. Date when full compliance will be achieved.
 - a. Full compliance has been achieved.

NRC COMMENT: (Appendix B)

- B. Section 9.10.1 of the Final Safety Analysis Report (FSAR) states that the fire protection systems and features for the plant, including fire barriers, will be designed to meet the standards of the National Fire Protection Association (NFPA). The standard for the fire doors is NFPA-80, Fire Doors and Windows. Section 516.b of NFPA-80-1968 Edition (Section 2-8.2 of the 1977 edition) requires all swinging type fire doors to be provided with approved positive latching devices.

Contrary to the above, the swinging type doors separating the three diesel generator rooms from the turbine building and the Unit 1 and 2 Switchgear rooms from the turbine building are not provided with positive acting latches to maintain these doors in the closed position in the event of fire. This discrepancy may also exist on other fire doors located throughout the plant.

This is a deviation.

RESPONSE:

The violation is correct as stated.

1. Corrective steps which have been taken.
 - a. Positive acting latches have been installed on the doors to the diesel generator room. Other fire doors have been inspected and a latching mechanism installed as needed.

RESPONSE: (continued)

2. Corrective steps to avoid further deviation.
 - a. Administrative controls will be provided to assure the effectiveness of other fire doors.
3. Data when full compliance will be achieved.
 - a. Full compliance has been achieved.