

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 23, 1980

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 Number 515
NO/RMT/jmj
Docket No. 50-281
License No. DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of May 30, 1980 in reference to the inspection conducted at Surry Power Station on May 5-8, 1980 and reported in IE Inspection Report No. 50-281/80-20. Our response to the specific infraction is attached.

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

Very truly yours,

Original Signed By
B. R. SYLVIA

B. R. Sylvia
Manager - Nuclear Operations
and Maintenance

Attachment

cc: Mr. Steven A. Varga, Chief
NRC Office of Nuclear Reactor Regulation
Operating Reactors Branch No. 1
Division of Licensing
Washington, D. C. 20555

A001
s
1/1

8006240283

Q

SURRY POWER STATION
RESPONSE TO NOTICE OF VIOLATION
IN I.E. INSPECTION REPORT
50-281/80-20

NRC Statement:

As required by Technical Specifications 6.4.A.7 and 6.4.D, detailed written procedures with appropriate check-off lists and instructions shall be provided and followed for preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

Contrary to the above, the "A" reactor coolant loop hydrostatic test procedure (DC 50006-P-4-U2A) performed on January 30, 1980 did not:

- a. Specify the position of all boundary valves associated with the test.
- b. Incorporate field changes discovered during the "B" and "C" hydrostatic tests though the action specified by the field changes was taken.
- c. Specifically identify removal of all procedure installed test equipment.
- d. Satisfactorily review that the alpha-numeric valve designators applied to the valve descriptions.

This is an infraction.

Response:

Item (a.) is not entirely correct as stated. The details of the inspection report state that 2-HCV-2557B, 2-HCV-2557C were found not positioned/checked positioned in the valve position checklist. The first sentence in attachment II of 50006-P-4-U2A mandates "hot and cold leg drains on B and C loop must be complete and shut". It is conceded that valve designations with sign off blanks would have been preferable. The details of report 80-20 also cite 2-RC-23, 82 as similar discrepancies. 2-RC-82 is the "C" loop hot leg drain and the above response applies. 2-RC-23, FE-2490 isolation valve was errantly omitted from the valve checkoff list.

Item (b.) is not entirely correct as stated. The details of the inspection report cites:

Field changes 20 and 24 closed the No. 1 seal water leakoff flow control valves (2-HCV-2303 series) to the non-hydrostatically tested reactor coolant pumps (RCP) during the "C" and "B" reactor coolant loop hydro tests respectively to prevent backflow through

the RCP seals. A similar valve arrangement was made during the "A" loop hydrostatic test without the necessary authorization in the instructions.

This statement is incorrect. The field change was incorporated into "A" hydro test procedure prior to its approval by the Station Nuclear Safety and operating Committee. HCV-2203B,C are closed by step 6.2.9 if P-4-U2A.

The report also cites:

Field changes 18 and 21 modified the requirements of Attachment VII to the "C" and "B" reactor coolant loop hydrostatic tests respectively to allow adding additional strip heaters to the reactor coolant piping crossover loop. Application of the strip heaters was to prevent the steam generator channel head temperature from dropping below the brittle fracture temperature limit of 150°F when the water of this pipe was forced into the steam generator during pressurization. No provision for this application was made for the "A" loop hydrostatic test, however the heaters were attached to the crossover loop piping.

This statement is correct.

Item (c.) of the inspection report states that P-4-U2A of ETA 50006 does not specifically identify removal of all procedure installed test equipment. On the contrary, step 6.7.3. states:

6.7.3 Close valves 2-RC-15, 2-RC-19 and remove the test relief valves installed in steps 6.1.6 and 6.1.7. Close valves 2-RC-14, 2-RC-16 and remove the spool pieces installed in step 6.1.8 Replace blanks using gaskets in accordance with NUS-20.

Removal of the hydrostatic test gage is accomplished by Part II of Attachment I which reads: Equipment and tools have been removed followed by a Q.C. hold. (NOTE: These same provisions are in P-4-U2B,C of ETA 50006.)

Item (d.) of the inspection report cites:

The alpha-numeric designator for valve 2-RC-24 appeared twice in the required valve position checklist (Attachment II) of the procedure. The first appearance identified the valve as an RTD discharge valve. The second time as an "A" primary loop flow transmitter leg isolation valve. The second appearance of the designator should have been identified as 2-RC-27. Even though incorrectly designated, the flow transmitter isolation valve was initialed by the positioning operator as positioned. A procedure deviation was not written against the attachment for resolution.

This statement is correct as written.

1. Corrective Action Taken To Prevent Further Non-Compliance

Operators and engineers involved have been reinstructed on the importance of procedural and administrative compliance. In addition, increased emphasis will be applied in SRO and RO retraining sessions on adherence to procedures, and proper documentation.

2. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.