

# Vepco

VIRGINIA ELECTRIC AND POWER COMPANY, RICHMOND, VIRGINIA 23261

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June 9, 1980

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

Serial No. 462  
PSE&C/RHWIII:bmt

Docket No. 50-280

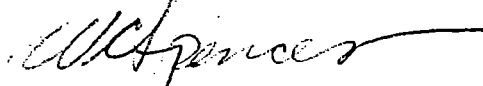
License No. DPR-32

Dear Mr. O'Reilly:

This letter is in response to your letter of May 16, 1980. The Notice of Deviation, 280/80-12-01, enclosed as Appendix A to your letter, expressed your concern that certain activities appear to deviate from commitments to the Commission, and have safety significance. The concerns of your staff as stated in the referenced letter and in the Inspection Report No. 50-280/80-12 and 50-281/80-13 are addressed in the attachment to this letter.

Should you have any questions concerning this letter, please contact us.

Very truly yours,



W. C. Spencer  
Vice President - Power Station Engineering  
and Construction Services

Attachment

cc: Mr. Victor Stello, Director  
Office of Inspection & Enforcement

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

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OFFICIAL COPY

Attachment to letter Serial No. 462, dated June 9, 1980  
Response to May 16, 1980 Notice of Deviation 280/80-12-01  
Surry Power Station, Unit 1

NRC Concern:

Notice of Deviation

Based on the results of the U.S. Nuclear Regulatory Commission inspection conducted on April 16-18, 1980, certain of your activities appear to deviate from your commitments to the Commission as indicated below:

VEPCO letter Serial No. 725 dated September 5, 1979, stated that "accessible supports will be upgraded expeditiously as deficiencies are noted during plant operation . . . as required by IE Bulletin 79-02." This letter further stated that, "We plan to fully comply with the intent and schedule of Bulletin 79-02 . . .". A letter from Region II to VEPCO dated September 7, 1979, confirming actions to be taken by VEPCO related to returning Unit 1 to service stated that, "It is our understanding that after you commence operation of Unit 1, you will continue the inspections required by IEB 79-02 for accessible systems." NRC Inspection Report 50-280/79-53, dated September 28, 1979, reiterated that the expeditious "Completion of the remaining inspections, tests, analyses and repairs as specified in IEB 79-02" was expected.

Contrary to the above, as of April 18, 1980 none of the additional inspections or testing required for IE Bulletin 79-02 had been initiated. No procedure had been prepared for performance of this work.

VEPCO Response

Our letter Serial No. 725 dated September 5, 1979 stated that, "The accessible supports will be upgraded expeditiously as deficiencies are noted during plant operation and non-accessible supports will be upgraded during the steam generator replacement outage as required by I.E. Bulletin 79-02." This letter further stated that, "We plan to fully comply with the intent and schedule of Bulletins 79-02 and 79-14 and to operate Unit No. 1 in compliance with the restrictions of the lifting of the Order to Show Cause dated August 22, 1979."

Compliance with IE Bulletin 79-02 is predicated on the completion of the piping and pipe support analyses associated with IE Bulletin 79-14 and the Order to Show Cause of March 13, 1979, which generate the loads required for base plate analysis for flexibility and the determination of anchor bolt design loads. During the period of interim operation since October 1979 we have been proceeding expeditiously with the piping and support analyses for IE Bulletin 79-14, including the base plate analysis for IE Bulletin 79-02. A total of about one thousand supports have been analyzed

April 29-May 2, 1980 transmitted to us by your letter of May 20, 1980. These actions show that we have initiated action which started the anchor bolt inspection and testing ahead of the schedule provided on December 7, 1980.

The letter from Region II to VEPCO, dated September 7, 1979 confirming actions to be taken by VEPCO related to returning Unit 1 to service stated that, "It is our understanding that after you commence operation of Unit 1, you will continue the inspections required by IEB 79-02 for accessible systems." NRC Inspection Report 50-280/79-53, dated September 28, 1979, reiterated that the expeditious "Completion of the remaining inspections, tests, analyses and repairs as specified in IEB 79-02" was expected. Item 6 of your Report Nos. 50-280/80-12 and 50-281/80-13 reported, "It is noted that the licensee did perform an inspection of accessible base plates in November 1979 to identify gross nonconformances such as missing or broken bolts or nuts, cracked grout, excessive skewing, etc." The results of the anchor bolt sampling programs conducted for Surry Unit 1 and reported to you in our letters of July 24, 1979, Serial No. 146/030879C, September 5, 1979, Serial No. 725, and October 4, 1979, Serial No. 817, indicated that anchor bolt inspection results, without confirmatory tension test results and corresponding analyses for anchor bolt loads, did not provide meaningful results to ensure anchor bolt adequacy. Therefore, we feel that the inspection and testing must be based on the results of the base plate analysis efforts and it is in this area where our efforts have been concentrated.

Your Notice, as quoted above, stated that none of the additional inspection and testing had been initiated and no procedure had been prepared for performance of this work. As of April 18, 1980 no procedure had been prepared, but meetings between VEPCO and Stone & Webster were held to discuss procedures on January 22, 1980 and March 10, 1980. Procedure STF-16, "Program for Inspection and Testing of Existing Expansion Anchor Bolts" was issued on April 26, 1980 and inspection and testing initiated on April 26, 1980. In addition, the procedure was revised to reflect the discussions held with your Inspector as reported in NRC Report Nos. 50-280/80-18 and 50-281/80-18. This procedure has been issued, STF-16, Revision 1.

In response to your letter of May 16, 1980, corrective actions that have been taken include the preparation of a procedure for anchor bolt inspection and testing, STF-16, dated April 25, 1980, and initiation of the testing program starting April 26, 1980.

Corrective actions which will be taken to avoid further deviations include the expediting of base plate analysis efforts to generate anchor bolt design loads and a continuing anchor bolt inspection and testing program implemented for Surry Unit 1.

The date corrective actions were completed was April 26, 1980 for the initial implementation of the anchor bolt inspection and testing program. Actions associated with IE Bulletin 79-02 will be completed by the time of the completion of the Surry Unit 1 steam generator replacement outage.