

SURRY POWER STATION
RESPONSE TO NOTICE OF VIOLATION
REPORTED IN APPENDIX A OF
IE REPORT 50-280/80-34 AND 50-281/80-37

NRC COMMENT

- A. As required by Technical Specification 3.7-2, Item 1.e "Engineered Safeguards Action", the high steamline flow instrumentation for actuation of Safety Injection shall be operable when the reactor is above the cold shutdown condition.

Contrary to the above, on August 19, 1980, during operation at 12% power, the six main steamline flow instruments were not operable, in that the flow transmitters were isolated and the electrical fuses were removed.

This is an infraction.

VEPCO RESPONSE

The item is correct as stated. The lack of steam flow instrumentation was identified by the licensee when steam flow did not indicate as expected during plant startup. The output bistables were placed in the tripped mode until the steam flow transmitters could be returned to service. A prompt report of the event was made and LER 80-011/01T-0 was submitted.

1. Corrective steps which have been taken and results achieved:

The fuses have been reinstalled and the transmitters have been returned to normal operation.

2. Corrective steps taken to avoid further noncompliance:

All I&C personnel were reinstructed to be sure that procedural steps are completed prior to being initialed. The reinstruction also included requirements for the use of the jumper log for removed fuses when not specifically addressed in a procedure.

All valve line ups and their return to normal positions will be placed in the Type A test procedure.

Instrument Surveillance test procedures (PT's) will be changed to include specific signatures for final alignment of protection system instrumentation.

Procedures requiring the removal of fuses for extended periods (longer than a shift) will be changed to require jumper log entries.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

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NRC COMMENT:

- B. As required by Technical Specification 6.4.D, detailed written procedures with appropriate check-off lists and instructions provided for operation, maintenance, calibration or testing of instruments, components, and systems involving nuclear safety shall be followed. Vepco NPS QA Manual, Section 14, assigns responsibility for the tagging of all equipment to assure that it is performed in accordance with procedures and in a safe manner.

Contrary to the above, appropriate tagging was not performed and procedures PT 2.9 and 2.9A were not followed as required when electrical fuses were removed and the transmitters isolated on the six Unit 2 main steam-line flow instruments FI 2472, 2475, 2484, 2485, and 2494 prior to Unit 2 startup. The steam flow instruments were found isolated and inoperable at 12:30 a.m. on August 19, 1980, while operating at 12% power.

This is an infraction.

VEPCO RESPONSE

The item is correct as stated. The lack of steam flow instrumentation was identified by the licensee when steam flow did not indicate as expected during plant startup. The output bistables were placed in tripped mode until the steam flow transmitters could be returned to service. A prompt report of the event was made and LER 80-011/01T-0 was submitted.

1. Corrective steps which have been taken and results achieved:

The fuses have been reinstalled and the transmitters have been returned to normal operation.

2. Corrective steps taken to avoid further noncompliance:

All I&C personnel were reinstructed to be sure that procedural steps are completed prior to being initialed. The reinstruction also included requirements for the use of the jumper log for removed fuses when not specifically addressed in a procedure.

All valve line ups and their return to normal positions will be placed in the Type A test procedure.

Instrument Surveillance test procedures (PT's) will be changed to include specific signatures for final alignment of protection system instrumentation.

Procedures requiring the removal of fuses for extended periods (longer than a shift) will be changed to require jumper log entries.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

NRC COMMENT

- C. As required by Technical Specification 6.4.A, detailed written procedures with appropriate check-off lists and instructions shall be provided for plant operation and all systems and components involving nuclear safety of the station, and for calibration and testing of instruments, components, and systems involving nuclear safety of the station.

Contrary to the above, Periodic Test procedure No. 36, "Instrument Surveillance" was not revised prior to Unit 2 startup on August 14, 1980, to reflect changes to Technical Specification 3.4.2.A.3 and 4 to the required levels in the refueling water storage tank (RWST) and the chemical addition tank (CAT). The revised TS minimum levels of 96% and 97% for the RWST and CAT were denoted in the Shift Order Book, but the minimum RWST and CAT levels listed in PT-36 were 94% and 77%, respectively, and led to operation of the RWST at 95% and the CAT at 96% on August 14 and 25, 1980.

This is an infraction.

VEPCO RESPONSE

This item is not totally correct as stated. The limiting conditions of operation were violated and a unit shutdown was initiated. LER 80-014/03L-0 was submitted on September 16, 1980 to the NRC. The event was identified by the licensee. The cause identified as PT-36 "Instrument Surveillance" is not the procedure used to insure tankage and systems are in compliance with the limiting conditions for operation. Its purpose is to prove compliance with T.S. Section 4.1 and verify "Channel Check" function of the instrumentation as defined in T.S. 1.0. The "Minimum Equipment List for Criticality and Power Operation" is the procedure/check list utilized to insure various components are operable in terms of volume, etc. This procedure was updated with the new required levels for the RWST and CAT on July 29, 1980. This was two weeks before the incident. Also, as noted in the violation, the information was re-emphasized in the shift order book and the tanks were in compliance as required by technical specifications. The normal draw down from the RWST for accumulator make up and cool down of the CAT accounted for the tanks going out of specification.

1. Corrective steps which have been taken and results achieved:

PT-36 has been revised to include the new requirements. The tanks were returned to within specification for the required plant conditions. The operations personnel were reminded of the new requirements.

2. Corrective steps taken to avoid further occurrences:

More timely procedure revising will be performed following design changes, system set point changes, or technical specification changes.

3. The date when full compliance will be achieved:

NRC COMMENT

- D. As required by 10 CFR 50.72 (a) (6), personnel errors or procedural inadequacies which, during normal operations, anticipated operational occurrences, or accident conditions, prevents or could prevent, by itself, the fulfillment of the safety function of those structures, systems, and components important to safety, must be reported to the NRC Operations Center by telephone as soon as possible and in all cases within one hour of the occurrence.

Contrary to the above, when the main steam flow instrumentation was found to be inoperable at 12:30 a.m. on August 19, 1980, the NRC Operations Center was not notified within one hour.

This is a deficiency.

VEPCO RESPONSE

The item is not correct as stated. This isolation "By itself" did not nor could not prevent the fulfillment of the safety function of the safety injection system. There is built-in diversity of input signals. Should a steam break have occurred, safety injection would have functioned as required. The core history was very small following the refueling, greater than one year shutdown, and low power physics testing, therefore, the potential for radioactive release was not substantial. The event was serious and discussed in the response to another notice of violation, however, it was not in violation of the requirements of 10 CFR 50.72.