

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

April 10, 1981

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. 205
NO/RMT:ms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

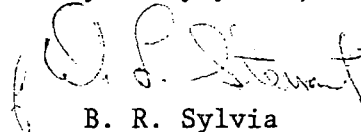
Dear Mr. O'Reilly:

We have reviewed your letter of March 19, 1981 in reference to the inspection conducted at Surry Power Station between January 2-30, 1981, and reported in IE Inspection Report Nos. 50-280/81-04 and 50-281/81-04. Our responses to the specific infractions are attached.

As concurred with by our principal resident site inspector on April 9, 1981, the information specifically requested in your letter concerning changes to the management control system will be forwarded under separate letter prior to April 20, 1981.

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. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,



B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

City of Richmond
Commonwealth of Virginia

Acknowledged before me this 10th day of Apr, 1981


Notary Public

My Commission expires: 3-24, 1981

SEAL

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 3
Division of Licensing

8105260701

RESPONSE TO NRC - "NOTICE OF VIOLATION"
REPORT NO. 50-280/81-04 AND 50-281/81-04

NRC COMMENTS:

Technical Specification 3.2B.4 requires that the Chemical and Volume Control System (CVCS) piping and valves shall be operable for reactor criticality, to establish two flow paths to the core; one flow path from the boric acid tanks to the charging pumps, and one from the RWST to the charging pumps.

Contrary to the above, the Unit 2 CVCS flow path from the boric acid tanks to the charging pumps was inadvertently isolated for some 30 minutes on January 2, 1981, during full power operations. Unit 2 valves, 2-CH-223 and 2-CH-226 were closed instead of the Unit 1 valves, 1-CH-223 and 1-CH-226, which were identified on the tags and tagging record. The Unit 2 emergency borate line was also inoperable (plugged) during the occurrence and therefore, only the RWST flow path was operable. The inspector subsequently observed that several CVCS valves, including 1-CH-226 and 2-CH-226, were not properly identified due to missing valve identification tags or boron encrustation and deposits on the valves and tags, complicating the valve identification and tagging process.

This is a Severity Level IV Violation (Supplement I.D.2).

RESPONSE:

1. Admission or Denial of the Alleged Violation:

The violation is correct as stated. This item, however, was identified by the licensee (LER-81-001/03L-0). As stated in the LER, the loss of flow path was promptly identified and the required actions of the technical specifications were performed. The emergency borate valve is a control grade system with no limiting condition of operation, and therefore should not be a factor in this violation. The Boron Injection Tank was available to provide boration capability for any emergency situation. In addition, the control rods were also capable of introducing negative reactivity if required. We therefore believe the assigned severity level is too high.

2. Reasons for the Violations:

The cause of this event was personnel error. Unit No. 1's valves 1-CH-223 and 1-CH-226 were to be tagged closed for maintenance. However, an operator inadvertently closed the Unit No. 2's valves, 2-CH-226 and 2-CH-223.

3. The Corrective Steps Which Have Been Taken and the Results Achieved:

The seriousness of the event was stressed to all personnel involved, and the individual was appropriately disciplined.

4. Corrective Steps Which Have Been Taken to Avoid Further Violations:

An inspection was made for the area with respect to valve identification tags. Any missing or hard to read tags were replaced. The differentiation between Unit 1 and 2 equipment is a matter of location within the station. The individual understood which unit he was to tag out and simply went to the wrong side.

5. The Date when Full Compliance will be Achieved:

Full compliance has been achieved.

NRC COMMENT:

10 CFR 50.55a and NRC letter to Vepco dated August 7, 1979, required the licensee to comply with the ASME Code Inspection requirements proposed in the May 17, 1979 Vepco inspection program submittal. Section XI of the above code and the licensee's program requires that full-stroke exercising for all Category A and B valves not exercised quarterly or exempted shall be exercised each shutdown when the valves have not been tested for three months or longer.

Contrary to the above, Category A and B valves listed in Periodic Test 18.6C, CSD Testing of Charging and SI MOV's and Check Valves, were not tested in accordance with the Section XI program when Unit 1 was in the cold shutdown condition on August 1-10, 1980, for SG tube plugging operations. PT 18.6C was last completed for Unit 1 on February 26, 1980, five months before the August outage and restart.

This is a Severity Level V Violation (Supplement I.E.), and applies to Unit 1.

RESPONSE:

1. Admission or Denial of the Alleged Violation:

The violation is correct as stated.

2. Reasons for the Violations if Admitted:

The code requirements were incorrectly interpreted. A review of the Section XI requirements had been directed by the Station Nuclear Safety and Operating Committee during the August outage. The review resulted in the interpretation that the CSD testing was not required. This result was subsequently reviewed by the Safety Committee, however, the documentation of this decision can not be located.

3. The Corrective Steps which have been taken and the Results Achieved:

ASME required testing of valves and components have not been scheduled with the unit in the extended maintenance outage. The item was not identified until after the unit had been shut down. Until that time, we believe we were in compliance. The required testing will be performed during the unit recovery.

4. Corrective Steps which will be taken to Avoid Further Violations:

A review of the code requirements and the in-place Periodic Test Procedures was performed to confirm requirements. A check list was developed for the identified plant conditions where the testing is required. A step was added to the start-up/shutdown controlling procedures to direct Operations to perform the necessary testing to meet the code requirements.

5. The Date when Full Compliance will be Achieved:

We are in full compliance with the above identified program. As stated above, a complete testing program will be completed on Unit 1 during the recovery following the present maintenance outage.