

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

November 2, 1984

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

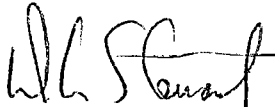
Serial No. 607
NO/HLM:DLN
Docket Nos. 50-280
50-281
Licensee Nos. DPR-32
DPR-37

Gentlemen:

We have reviewed your letter of October 5, 1984 in reference to the inspection conducted at Surry Power Station on August 1-31, 1984, and reported in IE Inspection Report Nos. 50-280/84-24 and 50-281/84-24. Our responses to the specific violations are 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. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,


W. L. Stewart

Attachment

cc: (w/attachment)

Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

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Q PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-24 and 50-281/84-24

VIOLATION

10 CFR 50.59 requires records of written safety evaluations which determine that an unreviewed safety question is not involved when the licensee makes changes in the facility as described in the safety analysis report (FSAR).

Contrary to the above requirement, as of August 31, 1984 a written safety evaluation of the facility change which removed the automatic trip valve isolation function on high flow from the RCP thermal barrier coolers and the primary drain coolers, as described in Section 9.4 of the Surry FSAR, was not provided and maintained.

This is a Severity Level IV Violation (Supplement I), and applies to both Units.

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

Prior to the initial operation of Units No. 1 and 2, (1972), the high flow trips for RCP thermal barrier coolers and primary drain coolers were defeated. Momentary pressure surges due to the starting of the Component Cooling Water (CCW) pumps caused the high flow trip valves to close on an excess flow signal. The high flow trips were removed when it was determined that their function would not enhance safety. The high flow trip valves were recognized to be inadequate to isolate the system on a thermal barrier failure because there were no installed upstream check valves. Evidence of a formal written safety evaluation for the defeating of the flow trip has not been located.

Subsequent to the defeating of the high flow trips, Stone and Webster Engineering Corporation, Vepco's principal A/E, proposed a long term solution in an October 11, 1972 letter. A design change request was initiated, but the proposed design change was never implemented.

Pursuant to 10 CFR 50.71 (e), the FSAR was initially updated in 1982 to reflect changes made to the facility since the issuance of the original FSAR in 1972. During this process, the description of the proposed modification, as described in the October 11, 1972 letter, was erroneously included in the updated FSAR (UFSAR).

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A formal written safety evaluation has been completed to support the defeating of the RCP thermal barrier cooler and primary drains tank cooler high flow trips. The evaluation concluded that an unreviewed safety question does not exist. Procedures controlling modifications including design changes and the updating of the UFSAR have already been strengthened. In addition, the annunciator response procedures have been strengthened to assure that clear guidance is provided to the operator in order to mitigate a thermal barrier failure.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Changes and updates to the UFSAR are and will continue to be processed as plant modifications are accomplished in order to preclude such occurrences in the future.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-24 and 50-281/84-24

VIOLATION

Technical Specification 6.4.D requires that the detailed written procedures provided for operation of the unit and of all systems and components involving nuclear safety of the station, including corrective maintenance on these systems and components, shall be followed. ADM-29.5 requires the bypass of safety functions to be performed in accordance with written, approved procedures.

Contrary to the above Technical Specification requirements; Administrative Procedure ADM 29.5, Section 4.2, and Electrical Maintenance Procedure EMP-C-RT-24 were not followed on August 21, 1984, when Unit 2 'B' train RPS reactor trip logic was bypassed during full power operation. Procedure EMP-C-RT-24, which was used to replace the failed BF relay in the RPS, did not specify bypassing the 'B' train reactor trip logic. The 'B' reactor trip bypass breaker was closed during the maintenance, and the 'A' RPS train and breaker were fully operable as required.

This is a Severity Level V Violation (Supplement I), and applies to Unit 2.

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

Unit 2 'B' train RPS reactor trip logic was bypassed as a precaution prior to replacement of relay PRB-XB.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Since the incident on August 21, 1984, ADM-29.5 has been reviewed with electrical personnel with emphasis on the proper use/intent of a jumper.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

EMP-C-RT-24 will be revised to include the following step under Section 4 (Precautions):

Ensure all jumpers are installed in accordance with ADM-29.5

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EMP-C-RT-24 will be revised by 11-30-84.