

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

January 21, 1985

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

Serial No. 723A  
NO/JDH:acm  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

In our January 2, 1985 (Serial No. 723) response to the Notice of Violation in IE Inspection Report Nos. 50-280/84-30 and 50-281/84-30, we inadvertently omitted part of our response regarding corrective steps taken to avoid further violations. The complete response, including the omitted information highlighted by a change bar, is attached. We apologize for any inconvenience caused by this oversight.

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: 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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RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/84-30 AND 50-281/84-30

VIOLATION:

Technical Specifications 6.4.A.2 and 7 require that detailed written procedures with appropriate check-off lists and instructions shall be provided for testing and for preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

Contrary to the above, adequate electrical maintenance and testing procedures were not provided for the following operations:

- a. On October 29, 1984, during maintenance and testing operations on the D 4160 volt transfer bus, the Reserve Station Service (RSS) auto load shedding was initiated which tripped the A main feedwater pump, and led to the Unit 2 low steam generator water level reactor trip from full power. The procedures used for the electrical testing and maintenance failed to specify the proper positioning of the auto load shed selector switch (manual) or the significance of the D transfer bus electrical breakers 15A1 and 25A1.
- b. On October 20, 1984, during the electrical realignment of AC lighting busses while defueling the Unit 1 reactor core, electrical power to the lights in the Unit 1 containment and the direct communications between the control room and the refueling cavity manipulator crane were momentarily lost with an irradiated fuel assembly in transit in the cavity pool. All movement stopped until the communications and lighting were restored. Inadequate precautions and coordination in the procedures and switching orders resulted in the loss of power during refueling operations.

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

RESPONSE:

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation (failure to provide adequate procedures) is correct as stated. However, clarification of the examples given in the Notice of Violation is submitted as follows:

- a. The initiation of load shedding on Unit 2 concurrently with unavailability of D transfer bus does not prevent the fulfillment of any safety function or impact the margin of safety assumed in chapter 14 (Accident Analysis) of the UFSAR.

- b. Technical Specifications require direct communications between the manipulator crane and the control room during changes in core geometry. During the momentary loss of communication, changes in geometry were not being made. A fuel assembly had already been removed from the core and was safely stored in the manipulator crane and was in transit to the fuel transfer system. The primary means of detecting abnormal conditions, with respect to reactivity changes, during changes in core geometry was in operation throughout the event, i.e., two channels of Source Range (safety grade) Nuclear Instrumentation.

REASONS FOR VIOLATION:

Load Shed

The impact of the load shed scheme on the unit not undergoing breaker testing had not been fully evaluated during the procedure review process subsequent to the installation of load shed. The lack of definitive guidance in the load shed design change package about the disabling of load shed was a contributing factor.

Loss of Communications

The consequences (precautions) of the realignment of AC lighting busses had not been fully evaluated or proceduralized.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Load Shed

Load shed was disabled during the remaining breaker testing. A detailed independent evaluation of the load shed event was conducted and numerous corrective actions initiated. For details of these actions, please see Licensee Event Report No. 84-015.

Loss of Communications

All fuel movement was suspended until the lighting and communications were restored.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Load Shed

The offsite group responsible for breaker testing will be making changes in their staffing and responsibility to improve the quality of their procedures.

Loss of Communications

A detailed procedure, including the necessary precautions and coordination, will be developed for the realignment of AC lighting busses.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Load Shed

Full compliance will be achieved by April 1, 1985.

Loss of Communications

Full compliance will be achieved by April 1, 1985.