

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

October 2, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Steven A. Varga
Operating Reactors Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 85-529A
NO/JBL:dn
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNITS 1 AND 2
GENERIC LETTER 83-28
ADDITIONAL INFORMATION

In your letter of July 8, 1985, you requested additional information for items 3.1.1, 3.1.2, 3.2.1 and 3.2.2 of Generic Letter 83-28. In our response of August 15, 1985 we indicated we would provide the requested information by October 2, 1985. The purpose of this letter is to provide the requested information. If you have any questions regarding this matter, please contact us.

Very truly yours,



W. L. Stewart

Enclosure

cc: Dr. J. Nelson Grace
Regional Administrator
Region II

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

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ENCLOSURE

Item 3.1.1

The licensee needs to confirm that test and maintenance procedures and Technical Specifications have been reviewed for safety-related components in the reactor trip system (RTS). This review is to assure that post-maintenance testing is specified in the procedures and that the testing will verify component capability to perform its safety functions prior to being returned to service. Your response to Item 3.1.1 states that Administrative Procedures, Quality Assurance (QA) procedures and Technical Specifications require post-maintenance testing and that a large quantity of unique maintenance and testing procedures implement these post-maintenance requirements; however, you did not confirm that these unique maintenance and testing procedures have been reviewed and that they contain requirements for post-maintenance testing to assure they meet their safety functions.

VEPCO Response

The maintenance and testing procedures for the reactor trip system have been reviewed and they contain requirements for post-maintenance testing to ensure they meet their safety functions. Generally, the maintenance procedure directs personnel to utilize a specified periodic test (PT) procedure to ensure that safety functions are met. Where a refueling PT is used to discover and correct deficiencies, the PT itself requires the safety function test.

Item 3.1.2

The licensee needs to confirm their review of vendor and engineering recommendations for safety-related components in the RTS to ensure that any appropriate test guidance is included in the test and maintenance procedures of the Technical Specifications. Your response only addresses the review of vendor recommendations for the reactor trip breakers. What about the remaining components in the RTS? Have you reviewed these vendor recommendations and associated test and maintenance procedures to ensure that the vendor recommendations have been evaluated and included as appropriate into your working-level procedures?

VEPCO Response

Vendor recommendations have been evaluated and included as appropriate into the working level procedures for the RTS. Our vendor interface program includes contacting vendors of safety related equipment at Surry Power Station and requesting the most recent technical manuals and any other recommendations. As these are received, they are reviewed for applicable revision to our procedures.

Item 3.2.1

The licensee needs to confirm that working-level test procedures, maintenance procedures and Technical Specifications were reviewed for all other safety-related equipment. This review is to assure that post-maintenance testing is required and that the testing verifies component capability to perform safety functions prior to being returned to service. Your response stated that a large quantity of unique maintenance and test procedures implement the post-maintenance testing requirements (Administrative Procedures, QA Manual and Technical Specifications); however, your response did not specify whether these working-level procedures and Technical Specifications associated with all other safety-related equipment had been reviewed.

VEPCO Response

We have determined that approximately 1386 Surry Power Station working level procedures will require review to assure that post-maintenance testing is required and that the testing verifies component capability to perform safety functions prior to being returned to service. Although it is our standard practice to perform post-maintenance testing of safety related components prior to restoration to service following maintenance, a complete review of these procedures will be completed to ensure that where applicable, the requirement is specified in the procedure. To ensure that this review addresses these requirements, we have revised our administrative procedure, (A-13) which governs the review of procedures, to require that the biannual procedure review provide documentation that functional testing of safety-related equipment prior to restoration to service following maintenance is included in applicable procedures. The review of the aforementioned procedures will be reviewed by a procedure review committee. The review will be completed no later than September 1, 1987. Progress of this review will be tracked.

Item 3.2.2

The licensee needs to confirm their review of vendor and engineering recommendations for all other safety-related equipment to ensure that any appropriate test guidance is included in the working-level test and maintenance procedures or the Technical Specifications. Your response states that the controls exist for assuring review and incorporation of vendor information into test and maintenance procedures; however, the response does not state that a review had been conducted of present (in use) working-level procedures to ensure that they contain or reference current technical information as appropriate.

VEPCO Response

We have determined that approximately 1386 Surry Power Station working level procedures will require review to assure that vendor and engineering recommendations for all other safety-related equipment have been reviewed and any appropriate test guidance has

been included in these procedures. Although it is our standard practice to include such information in applicable procedures, a complete review of these procedures will be completed to ensure that the appropriate recommendations are included. To ensure that this review addresses this requirement, we have revised our administrative procedure (A-13) which governs the review of procedures, to require that the biannual procedure review provide documentation that vendor and engineering recommendations have been included where appropriate. The review of the aforementioned procedures will be reviewed by a procedure review committee. The review will be completed no later than September 1, 1987. Progress of this review will be tracked.