

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

February 26, 1988

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No. 88-059
NO/GDM:pms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

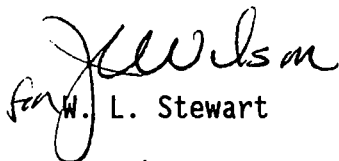
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NRC INSPECTION REPORT NOS. 50-280/87-32 AND 50-281/87-32

We have reviewed your letter of January 27, 1988 in reference to the inspection conducted at Surry Power Station on November 16-20, 1987 and reported in Inspection Report Nos. 50-280/87-32 and 50-281/87-32. Our response to the violation described in the Notice of Violation and the deviation described in the Notice of Deviation are addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact us.

Very truly yours,


W. L. Stewart

Attachment

cc: U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, GA 30323

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

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RESPONSE TO THE NOTICE OF DEVIATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED ON NOVEMBER 16-19, 1987
INSPECTION REPORT NOS. 50-280/87-32 AND 50-281/87-32

NRC COMMENT:

The following deviation was identified during a Nuclear Regulatory Commission (NRC) inspection conducted on November 16-20, 1987.

By letter dated June 29, 1984 (Serial No. 095A) the licensee informed the NRC that "at the specific operation task level a detailed review of each high level step would be performed during the revision upgrade from the generic emergency response guidelines (ERG) to plant specific procedures." The licensee informed the NRC that specific forms would be utilized to provide cross-reference capabilities between plant specific steps and the ERG steps from which they are derived. The letter further states that as appropriate, entries on these forms identify and justify deviations of deletions/additions on sequencing and significant deviations to step content, other than minimum wording.

Contrary to the above, for EP-1.02A, Natural Circulation Cooldown, Rev. 1, the licensee has not provided adequate written justification in the step deviation document where EP-1.02A deviates from Revision 1 of the Emergency Response Guidelines. Specifically, for the reduction of sub-cooling margin as a result of the Reactor Coolant System depressurization to establish residual heat removal flow.

RESPONSE TO NOTICE OF DEVIATION
INSPECTION REPORT NOS. 50-280/87-32 AND 50-281/87-32

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED DEVIATION

Virginia Electric and Power Company acknowledges that for EP-1.02A there is a deviation from the Procedure Generation Package for failure to provide adequate written justification in the step deviation document where EP-1.02A deviates from Rev. 1 of the Emergency Response Guidelines.

(2) REASONS FOR DEVIATION

Written justification for the deviation from Rev. 1 of the Emergency Response Guidelines (ERGs) was provided within the setpoint document for the Emergency Operating Procedures (EOPs). Failure to document this deviation in the step deviation document was caused by improper cross referencing with EOP support documents.

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

The EOP support documents have been reviewed to ensure proper documentation is available to support the deviation from the WOG ERGs. The step deviation document has been updated to provide the proper cross-reference to the EOP support documents.

(4) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER DEVIATIONS

The balance of the EOPs and the setpoint package will be reviewed during the next review cycle to ensure that deviations from WOG ERGs are properly documented in step deviation documents. If any cases of inadequate documentation are identified as part of other revisions being made to the EOPs, they will be addressed as they are identified.

In order to clarify the relationship between the step deviation documents and the setpoint package, the step deviation documents will be annotated to reference the setpoint package as appropriate.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EP-1.02A is in compliance with the Procedures Generation Package. The review of the remaining EOPs and cross-referencing of the step deviation document to the setpoint package will be completed by March 1989. This corresponds to the completion date for revising the EOPs to incorporate changes identified in Revision 1A of the WOG ERGs.

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED ON NOVEMBER 16-20, 1987
INSPECTION REPORT NOS. 50-280/87-32 AND 50-281/87-32

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on November 16-20, 1987, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

10 CFR 50, Appendix B, Criterion V requires that instructions, procedures, and drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Technical Specification 6.4 requires that detailed written procedures with appropriate check-off lists and instructions be provided for actions to be taken for specific and foreseen malfunctions of systems or components including alarms, primary system leaks and abnormal reactivity changes.

Contrary to the above, the procedure utilized by the licensee for Natural Circulation Cooldown, EP-1.02A, Rev. 1 is inadequate in that the cooldown curve referenced as Attachment 2 in the procedure, is less conservative than the Technical Specification heatup/cooldown curve, Figure 3.1-1.

This is a Severity Level IV violation (Supplement I).

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/87-32 AND 50-281/87-32

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASON FOR VIOLATION

During the development of the Emergency Operating Procedures (EOP), it was assumed that the heatup/cooldown curve contained in the Technical Specifications was based on average RCS temperature (T_{avg}). It was desired to present limits based on RCS cold leg temperature in the EOPs. For natural circulation conditions, a core delta T of 30° was assumed. Therefore, the Technical Specification curve was shifted 15° to the left to derive the cold leg curves for the EOP. It has subsequently been determined that RCS cold leg temperature is the basis for the Technical Specification curve which makes the cooldown curve contained in EP-1.02A non-conservative with respect to Technical Specifications.

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

A temporary procedure change was prepared and approved by the Station Nuclear Safety and Operating Committee to direct the operator to use the cooldown curve located in the Operator Curve Book which is equivalent to the curve in Technical Specifications. Engineering has been directed to prepare a curve for use in the Emergency Procedures. Also, a Technical Specification change request has been submitted which indicates the cooldown curve is based on the RCS cold leg temperature.

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

Emergency procedures EP-1.02A and EP-1.02B will be revised to include the correct cooldown curve.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The emergency procedures EP-1.02A and EP-1.02B will be revised by March 31, 1988.