

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

R. H. LEASBURG  
VICE PRESIDENT  
NUCLEAR OPERATIONS

12 APR 6 10 50  
April 2, 1982

Mr. James P. O'Reilly  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

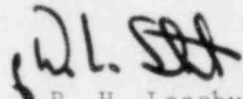
Serial No. 158  
NO/RMT:acm  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of March 4, 1982 in reference to the inspection conducted at Surry Power Station between December 14, 1981 and January 22, 1982 and reported in IE Inspection Report Nos. 50-280/82-01 and 50-281/82-01. Our response to the specific infraction is attached.

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,

  
R. H. Leasburg

Attachment

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

820423 0546

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/82-01 AND 50-281/82-01

NRC COMMENT:

As a result of the inspection conducted on December 14, 1981 - January 22, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

Criterion XVI of Appendix B to 10 CFR 50, and Section 16 of the VEPCO NPS QA Manual, "Corrective Action", establish measures to assure that conditions adverse to quality, such as failures, deficiencies, deviations, defective material and equipment, are promptly identified, and corrected. T. S. 4.4.C require that the leakage rate of all penetrations and valves subject to Type B & C tests shall be less than 0.6 of the maximum allowable containment leakage. Electrical containment penetration A-18 is subject to Type B leakage tests.

Contrary to the above, prompt corrective action was not taken when Unit 2 electrical containment penetration A-18 was found leaking in excess of its acceptance criteria during the performance of Periodic Test 34, "Electrical Penetration Leakage Test", on October 15, 1981. The identified leakage was not determined to be within the permissible maximum allowable leakage. Subsequently, a containment integrated leak rate test performed on December 15, 1981, failed due to excessive leakage through the A-18 penetration.

This is a Severity Level V Violation (Supplement I.E.).

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This item is correct as stated.

(2) REASONS FOR VIOLATION:

At the time the leakage was identified on PT-34 it was believed the electrical penetration was providing a barrier between the containment and the outside atmosphere. Periodic Test 34 does not provide a quantitative test of the leak tightness of a penetration, however, lack of operational vacuum problems with the subatmospheric containment supported the belief that the containment barrier was intact. During the refueling outage, in preparation for the Integrated Leak Rate Test (Type "A" Test), a Type "B" Test was performed on the penetration. This test revealed no excessive leakage. When penetration leakage was identified during the Type "A" Test, it was then determined the Type B test procedure was inadequate and did not properly pressurize the penetration. The exact time of the failure of the penetration to provide a seal is not known. The Type "A" Test may have aggravated the leakage and caused the failure.

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

The penetration was repaired. The Type B test procedure was revised to provide for proper testing. The penetration was tested satisfactorily. A Type "A" Test was performed with acceptable results.

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

PT-34 has been modified to include recorded as-found and as-left values such that an evaluation of the leakage noted can be made.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.