

DCS

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

April 22, 1983

United States Nuclear Regulatory Commission
Attn: Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
Washington, D. C. 20555

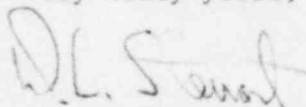
Serial No. 203
NO/WDC:acm
Docket No. 50-280
License No. DPR-32

Gentlemen:

We have reviewed your letter of March 24, 1983 in reference to the inspection conducted at Surry Power Station between October 4, 1982 and October 31, 1982, and reported in IE Inspection Report No. EA 82-143. Our response to the specific infraction is 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

Attachments

1. Response to Notice of Violation
2. Voucher Check in payment of Civil Penalty

cc: Mr. James P. O'Reilly
Regional Administrator
Region II

8305100315 830422
PDR ADOCK 05000280
Q PDR

IE-14
Return original
B. Summers IAE

RESPONSE TO NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY
EA 82-143

NRC COMMENT:

At 10:45 p.m. on October 16, 1982, while conducting a routine daily test to sample and analyze the water in the chemical addition tank discharge lines, manual isolation valves 1-CS-116 and 1-CS-118 were found closed by facility operations personnel. The closed valves isolated the tank from the containment spray pump suction lines, rendering the chemical addition system inoperable. The inspection findings indicate that the valves were apparently closed in conjunction with corrective maintenance on valves MOV-CS-102A and B during an outage which ended with restart of Unit 1 on October 15, 1982.

To emphasize the need for adequate and properly implemented procedures to restore safety-related systems to operability following maintenance or other activities that involve valve manipulations, the Nuclear Regulatory Commission proposes to impose a civil penalty in the amount of Twenty Thousand Dollars.

In accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C) and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the particular violation and associated civil penalty is set forth below:

Technical Specification 3.4.A.5 requires that all valves, piping and interlocks associated with the refueling water chemical addition tank shall be operable before the unit's reactor coolant system temperature or pressure exceeds 350°F or 450 psig, respectively.

Contrary to the above, between 2:35 a.m. on October 15, 1982, and 10:45 p.m. on October 16, 1982, the reactor coolant system temperature and pressure exceeded 350°F and 450 psig, respectively, and chemical addition tank discharge valves 1-CS-116 and 1-CS-118 were closed, rendering the chemical addition tank inoperable.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

This violation was resultant from weak administrative controls regarding verification of proper restoration of Safety Related Systems following significant maintenance.

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

- a. The Engineering Safeguards valve check list has been reviewed and was revised on November 9, 1982 to insure all valves capable of disabling Safeguards systems are checked and verified.
- b. The Engineering Safeguards valve check list was added to the Startup procedure on October 21, 1982 at the 350°F and criticality check points.
- c. The requirement to have system valve line up's performed for designated systems was added to the Start up procedures on November 18, 1982.
- d. Maintenance Operating Procedures for the Containment Spray Pumps have been reviewed for accuracy and modified to require an independent verification of proper system alignment when returning a pump to service following significant maintenance.

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

In addition to strengthening the Maintenance Operating Procedures for the Containment Spray Pumps, similar revisions are being made to procedures for all other Engineered Safeguards components. It is expected that the requirements for valve alignment verification will be included into the Maintenance Operating Procedures for all Safety Related Pumps in Engineered Safeguards Systems. This action should be complete by 5-16-83.

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

Full compliance has been achieved.