

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

December 16, 1983

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street Suite 2900
Atlanta, Georgia 30303

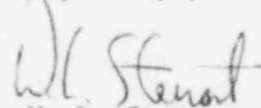
Serial No. 695
NO/WDC:jab
Docket No. 50-281
License No. DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of November 16, 1983 in reference to the inspection conducted at Surry Power Station between September 30 and October 3, 1983 and October 6 and October 7, 1983, and reported in IE Inspection Report No. 50-281/83-30. Our response to the specific infractions are 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

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-281/83-30

As a result of the inspection conducted on September 30 - October 3 and October 6 - 7, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

NRC COMMENT:

10 CFR 50, Appendix B Criterion V requires that activities affecting quality shall be accomplished in accordance with instructions, procedures, or drawings. This requirement is implemented by the VEPCO Nuclear Power Station Quality Assurance Manual Sections 5.0 and 5.4.

Contrary to the above, procedures were not followed in that:

1. Periodic Test procedure 2-PT-28.11, Nuclear Design Check Test, Appendix A1 was not performed as required in that a temporary change was implemented prior to documented approval by the cognizant supervisor and a licensed senior reactor operator (SRO) on the "Procedure Deviation" form.
2. Periodic Test procedure 2-PT-28.11 was not followed in that test data were not recorded (documented) at the frequency specified in Appendix A2.

This a Severity Level V Violation (Supplement I).

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

Appendix A1 of PT-28.11 deals with the determination of the Zero Power Testing Range (the allowable flux range during zero power physics testing). The instructions given were intended to give the Test Director guidance so that he may evaluate the data obtained. However, the step, as written, should have been deviated as a result of the data analysis. Persons involved in the performance and in the review of the procedure failed to make this determination.

Appendix A2 of PT-28.11 supplied additional data to assist the Test Director in determining the Zero Power Testing Range. Data obtained was adequate to determine the Point of Doppler Heating yet data was not taken in the frequency specified by the procedure.

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

The required Procedure deviations have been processed to justify and document the changes made during testing.

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

A complete review of the test procedure PT-28.11 will be done. Steps will be modified as necessary, to insure that the requirements are clearly defined. This review and any identified changes will be completed prior to the next refueling outage.

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

Full compliance has been achieved with the processing of the procedure deviation noted in (3) above.