

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

January 27, 1984

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

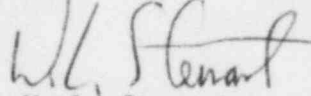
Serial No. 004  
NO/WDC:jab  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of December 29, 1983, in reference to the inspection conducted at Surry Power Station between September 6, 1983, and October 7, 1983, and reported in IE Inspection Report Nos. 50-280/83-30 and 50-281/83-31. 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

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

8402280426 840209  
PDR ADOCK 05000280  
Q PDR

## APPENDIX A

### NOTICE OF VIOLATION

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

Criterion XVI of Appendix B to 10CFR50 and Section 16 of the Vepco QA Manual require that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, and nonconformances are promptly identified and corrected. Section 3.3.4.2 of Administrative Procedure (AP) 8.6, Operation of the Maintenance Department requires that prompt and thorough corrective maintenance be performed and paragraph 5.9 of QA implementing procedure, Operations Maintenance Instruction 15 requires prompt corrective action along with a nonconformance report.

Contrary to the above requirements, prompt and adequate corrective actions were not taken and nonconformance reports were either not written, or not taken action upon, for the following adverse conditions:

1. On September 16, 1983, the inspector observed that the Unit 1 and 2 service water valve pit flood control panel alarms were annunciated in the control room, but no documentation or response to the alarm was apparent. The inspector observed some three feet of water rising in the MOV-SW-203A and B valve pit in the Unit 2 turbine building basement due to an open drain valve.
2. On September 23, 1983, the inspector observed that the Unit 2 480 Volt AC Emergency Bus MCC Breaker Trip alarm (2K-G-7) was annunciated in the control room, but that no response or corrective action to the alarm had been taken or documented.
3. On September 22, 1983, two of the four Unit 1 motor operated valves (MOV-SW-103B and C) failed to open during periodic testing (PT 25.2) due to low torque switch settings. Corrective action to update the increased torque switch settings on the equipment cards following previous valve failures and reviews was not taken.
4. On June 30, 1983, Unit 2 power was decreased in preparation for a three month outage. At 24 percent power, Unit 2 tripped on high steam generator (SG) B water level due to excessive feedwater valve leakage. On September 28, 1983, following the outage, Unit 2 experienced two trips during startup due to high water level in the B steam generator. Adequate corrective action had not been taken on the main feedwater bypass valves, which had excessive leakage through the valves, and resulted in unnecessary challenges to the safety systems; the valves were repaired after the second trip.

This is a Severity IV Violation (Supplement I) and applies to both units.

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/83-30 & 50-281/83-31

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated. It should be noted that the issuing of a nonconformance report is specifically exempted by Vepco Topical Report 17.2.15 which says nonconformance reports are not required for in-service failures.

(2) REASONS FOR VIOLATION:

In order to show that no specific weaknesses exist in varied corrective actions programs and that the cited examples represent, at worst, a weak effort on the part of individuals in the implementation of such programs, each example will be discussed separately.

1. During the September 16, 1983, occurrence, with the unit at cold shutdown, operators were draining the service water lines downstream of MOV-SW-203A and B. As a part of this planned evolution a temporary sump pump was in place to keep up with the drain rate. It is not unusual during this evolution to receive a flood alarm and hence an operator usually makes frequent inspections to verify that the sump is pumping. In this instance the pump failed while the operator was away and the water level rose until noticed by the Inspector. This event is more considered random caused by equipment failure rather than an example of a weak corrective actions program.
2. The alarm observed by the Inspection on September 23, 1983 was subsequently observed by an on duty SRO who notified the SRO on call, submitted a Station Deviation, and investigated to find that no MCC breakers were tripped. This corrective action was completed within six hours of the initial observation made by the on duty SRO. The reason for the large time gap (four days) between the two observations of the alarm is not easily explained, but one contributing factor may have been that the unit was in a startup condition and multiple alarms and required actions detracted from the significance of this alarm. Note also that the problem was with a stuck button and that at no time was a MCC out of service. Completion of indicating light board walkdowns and minimum equipment checklists verified that required safety equipment was operable.
3. The problems with MOV-SW-103B and C were discovered previous to the September 22, 1983, event, reported to the NRC (LER 83-003/OT1-0), and corrective action initiated. Part of the original corrective action in fact was to include these valves in the surveillance program which prompted the September 22, 1983 test. Contact was established with the valve manufacturer and limit torque with emphasis on a prompt resolution of the problem. A significant event review meeting was held with Corporate Engineering and Management. A valve MOV analysis consultant tested and analyzed these valves in September 1983, and recommended increasing the torque switch setting to the maximum value for the close to open cycle. A Vepco Engineering Study to increase the open torque switch setting was approved by the SNSOC on September 29, 1983. The equipment status cards were updated following implementation of the study.

4. Feedwater control problems at low power levels are generic to Westinghouse PWR's. The example cites leaky bypass valves as the culprit which would not likely be the case for a trip from 24% power where bypasses would be significantly opened. MR 2308300209 was issued against B main feed reg. valve and the valve was repaired. Prior to unit synchronization on September 28, 1983, feed control valves were satisfactorily leak checked twice. The unit was successfully placed on line following the two trips but no significant repairs had been made to feedwater FCV's. The primary reason for the first of the aforementioned trips was a miscalibrated chart recorder.

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

The importance of alertness to conditions adverse to quality has been stressed to all operators with emphasis on the initiation of and follow through on proper corrective actions.

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

None are required. The emphasis placed on prompt action on abnormal conditions has resulted in significant improvement in response and timely corrective action.

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

Full compliance has been achieved.

SEC 4.1  
Revision 3.0  
Form SEC 4.1-2  
4-29-83

NRC COMMITMENT CONTROL FORM

Serial No: 004 Date: 1-26-84

Station: Surry

Subject: Notice of Violation

Originator/Department: Wanda Craft /SEC

Does this correspondence change any information or commitments currently presented in the affected station's UFSAR? yes \_\_\_\_\_ no ✓

If yes, affected sections: \_\_\_\_\_

Does this correspondence make any commitment for additional information, additional submittals or completion dates for projects or activities?

yes \_\_\_\_\_ no ✓

If yes, briefly list commitment(s) and date(s) (or attach a highlighted copy noting the above.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Completed by: Wanda Craft  
Originator

RETURN TO SEC LICENSING COORDINATOR