

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

November 4, 1983

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

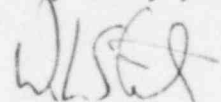
Serial No. 586
NO/WDC:acm
Docket Nos. 50-280/
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of October 7, 1983 in reference to the inspection conducted at Surry Power Station between July 2 and August 5, 1983 and reported in IE Inspection Report Nos. 50-280/83-20 and 50-281/83-20. 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
Operating Reactors Branch No. 1
Division of Licensing

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/83-20 AND 50-281/83-20

As a result of the inspection conducted on July 2 through August 5, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

A. NRC COMMENT:

Technical Specification (TS) 6.4.A.2 requires that detailed written procedures with appropriate checkoff lists and instructions shall be provided for the calibration and testing of components and systems involving nuclear safety of the station.

Contrary to the above, detailed written procedures with appropriate checkoff lists and instructions were not provided for hydrostatic testing of the Unit 1 containment spray (CS) pump 1-CS-P-1B and piping. The procedure used, PT 53.1, "ASME System Pressure Tests," did not adequately address the removal or installation of seismic supports or hangers during blank flange installation or removal, and led to the inspector's observation of an unbolted seismic support (H-11) on the CS pump 1B discharge piping on May 31, 1983, during low power physics testing. Engineering analysis of stresses with the unbolted condition determined that a potential for exceeding stress limits would only exist if the CS pump were started or running during the design basis earthquake (DBE).

This is a Severity V Violation (Supplement I) and applies to Unit 1.

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

The procedure in question, PT 53.1, was not intended to be used for the removal or installation of supports on the affected system. Appendix III of the PT provides a means to record specific instructions not contained in the body of the procedure. This section should have been used to identify the need for both the removal and reinstallation of the support in question.

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

To alleviate the potential for this or similar event to occur again, PT 53.1 has been modified to include in the body of the procedure a requirement to insure proper installation of supports removed for the test.

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

None Required.

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

Full compliance has been achieved.

RESPONSE TO NOTICE OF VIOLATION
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B. NRC COMMENT:

TS 6.4.J requires that the facility fire protection program and implementing procedures, which have been established for the station, shall be implemented. In addition, TS 5.18.F requires monthly visual inspections of fire hose stations to assure equipment availability and operability.

Contrary to the above:

1. A section of horizontal electrical cable tray C-11 in the Unit 1 emergency switchgear room overhead was observed uncovered on July 29, 1983; the tray covers serve as fire barriers.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

The cable tray was believed to have been uncovered by construction workers performing Design Change work.

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

The cover was replaced on C-11. In addition a complete review of all cable trays was performed by the Fire Marshall and noted discrepancies corrected.

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

Construction has been informed of the necessity of reinstalling all cable tray covers removed during the performance of design change work. Also, the monthly Fire Protection Inspection Reports now include the requirement to inspect cable trays.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

B. NRC COMMENT: (Continued)

2. Completed records of the following 1983 fire protection monthly periodic tests (PT) were not found at the station:

PT 24.4A, Fire Protection Systems (Extinguishers and hose stations) for June.

PT 24.18, Test of Smoke Detection Power Supply for May.

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

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

PT 24.4A, Fire Protection Systems (Extinguishers and hose stations) was misplaced when the personnel performing the inspection took vacation. PT 24.18, Test of the Smoke Detection Power Supply, was not performed due to a scheduling error.

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

A determination was made by interviewing the performer of PT 24.4A for the month of June that the PT was in fact performed. A Procedure Unaccounted For form was subsequently filled out and is now on file attesting this. Satisfactory Performance of PT 24.18 was verified for the subsequent month following the missed surveillance.

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

The corrective action stated in item (3) is considered adequate for PT 24.4A. Greater emphasis is being placed on the careful scheduling and performance of surveillance testing by the electrical maintenance department. This improved awareness should eliminate future missed surveillances.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/83-20 AND 50-281/83-20

C. NRC COMMENT:

ASME Code Section XI, Article IWV-3000, and Vepco Administrative Procedure ADM-71, "ASME Code Section XI, Repair/Replacement Program", require motor operated valve stroking or ISI exercising tests after the MOV has been repaired or undergone maintenance that could affect its performance, such as adjustment of stem packing.

Contrary to the above, ISI testing has not been required following the adjustment of stem packing on several safety-related motor operated valves on Units 1 and 2. Item 25 on the following Maintenance Reports was completed by stating that no ISI (testing) was required following packing adjustment on the following MOV's:

MRS1305301422 (MOV-1286C)
MRS1306152201 (TV-BD-100B)
MRS1306091320 (MOV-RH-100)
MRS1306132112 (MOV-1275B)
MRS2305250656 (MOV-2373)
MRS2305250250 (MOV-2275B)

The valves were stroked and timed during subsequent periodic testing to verify valve performance.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated. Although it should be noted that, except for TV-BD-100B none of the cited MOVs are in engineered safeguards flow paths to the core or require automatic operation to mitigate the consequences of an accident. It is further noted that MOV 1286C is not covered by ISI at Surry since it has no automatic function and is a normally open valve used for maintenance isolation.

(2) REASONS FOR VIOLATION:

The reason for this violation is resultant partially from inadequate training of shift supervisors and operations maintenance coordinators in the pertinent aspect of inservice inspection requirements, and partially because of inadequate controls over minor maintenance considered "Skill of the Craft" which may be performed without detailed procedures.

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

Operating personnel and the operations maintenance coordinator were promptly apprised of the concern and situation when it was first identified. The requirements of ADM-71 were reiterated to the individuals responsible for determining ISI requirements and authorizing maintenance.

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

Additional measures to preclude future occurrences are being evaluated. This may include a procedure/follower for minor maintenance which would specify components requiring testing following maintenance.

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

Full compliance has been achieved.