

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

March 28, 1984

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

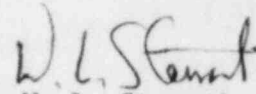
Serial No. 138
NO/WDC:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of February 28, 1984 in reference to the inspection conducted at Surry Power Station on January 30 - February 2, 1984, and reported in IE Inspection Report Nos. 50-280/84-03 and 50-281/84-03. 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

8405070474 840423
PDR ADOCK 05000280
Q PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-03 AND 50-281/84-03

The following violations were identified during an inspection conducted on January 30 - February 2, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

NRC COMMENT:

Technical Specification 4.17.C.6, requires that, for each snubber that does not meet the functional test acceptance criteria, functional testing be performed on an additional 10 percent of that type of snubber.

Contrary to the above, functional testing of an additional 10 percent of each type of snubber that failed to meet the acceptance test criteria was not performed for the 20 Unit 1 and 23 Unit 2 snubbers that failed to meet the functional test acceptance criteria.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

In the process of modifying the snubber program to comply with upgraded Snubber Technical Specifications, specific functional test selection criteria was generated. Snubbers were divided into specific categories based on environment, size, system, manufacturer, etc. in accordance with guidance provided by the ASME draft standard, Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers) O & M-4.

On the initial test sample, 10% of each specific category was selected which resulted in a conservatively large number of snubbers due to the large number of categories. However, the Technical Specifications require that for each snubber that fails the functional test, an additional 10% of that type snubber be tested. Type in this case was interpreted to consist of the previously selected specific category, rather than a more broad based, generic type of snubber such as all snubbers subject to a common failure mode constituting a type. The end result was that the number of retest snubbers selected was smaller than if the more broad based definition of type had been employed.

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

Snubbers which were not tested during the 1983 refuelings have been tested on Unit 1 during the February - March outage and are in the process of being tested during the current outage on Unit 2. Testing does not include large bore snubbers or some small bore snubbers not subject to generic retest criteria.

The results of all testing will be provided in separate LER's.

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

The snubber program has been modified and incorporated into the Station Administrative procedures. The program delineates the functional test selection and retest selection criteria to correspond to the broad based definition of snubber type as discussed in (2) above. The Administrative Procedure was issued on March 15, 1984 and the Surveillance Test Procedures will be updated by June 15, 1984. The modified program will strengthen the functional test program and preclude generic failures from being overlooked.

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

Full compliance has been achieved on Unit 1 with the completion of the spring maintenance outage.

Full compliance will be achieved on Unit 2 at the end of the present maintenance outage scheduled for April 1, 1984.