

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

APR 30 1984
April 27, 1984

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

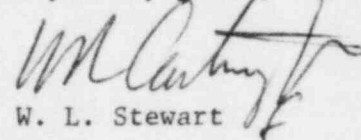
Serial No. 228
NO/JDH:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of March 30, 1984 in reference to the inspection conducted at Surry Power Station on February 6 - 10, 1984, and reported in IE Inspection Report Nos. 50-280/84-05 and 50-281/84-05. Our response to the specific violation 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

8405300635 840523
PDR ADDCK 05000280
Q PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-05 AND 50-281/84-05

NRC COMMENT:

10 CFR 50 Appendix B, Criterion XVI, as implemented by Vepco Topical Report VEP-1-3A, paragraph 17.2.16, requires the licensee to establish measures to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the requirements of Criterion XVI, measures established by the licensee did not assure the prompt correction of conditions adverse to quality, as exemplified by the licensee's failure to obtain prompt correction of identified instances of nonconformance and conditions which could, and subsequently did, lead to additional nonconformance. The specific instances referred to involve nonconformance with the requirements of the inservice inspection code specified by 10 CFR 50.55 a(g) (i.e., the ASME Boiler and Pressure Vessel Code, Section XI-hereafter the "Code") and are as follows:

1. The Code requires that the licensee obtain and utilize the services of an ASME Authorized Inspection Agency which will employ Inspectors and Inspection Specialists to witness and otherwise verify the acceptability of the licensee's performance of inservice inspections. As record of verification of acceptable inservice inspection, the Code requires the licensee to obtain the signature of the Inspection Agency's Inspector on a Code Data Report for each inservice inspection certifying that the inservice inspection examinations were in accordance with the Code. The Code Data Report and other specified information comprise inservice inspection reports which the Code requires the licensee to submit to the NRC within 90 days of completion of an inservice inspection.

Contrary to the above requirements, for a Unit 1 inservice inspection completed in 1982, the licensee did not obtain the Inspector's signature on the required Data Report and the Code inservice inspection report of which Data Report was to be a part, was not submitted to the NRC within the specified 90 days apparently because of the lacking signature. As of February 10, 1984, the submittal still had not been provided to the NRC. Licensee personnel were aware of the nonconformance but failed to promptly identify it in accordance with the licensee's procedures for obtaining corrective action and did not obtain prompt correction. The conditions were identified by the licensee for corrective action, over a year after the occurrence, in their Deviation Report SI-84-038.

2. The Code specifies requirements for ultrasonic examination procedures used in inservice inspections. In a letter to the licensee dated July 21, 1983, deficiencies in the ultrasonic examination procedures for the 1983 Unit 2 outage were identified and questioned by the Authorized Inspection Agency Inspection Specialist. The Specialist stated in the letter that, if the procedural deficiencies were not resolved, the Inspector would not sign the Data Report for the inservice inspection. In NRC Inspection Report 280, 281/83-19, dated September 1, 1983, the NRC inspector identified his concern that the deficiencies be corrected. The procedural deficiencies were not documented for disposition or otherwise

addressed in any manner established by the licensee for assurance of prompt correction. The reported procedural deficiencies were not promptly resolved and were used in the inservice inspection completed September 28, 1983. As a consequence of the licensee's failure to promptly resolve the deficiencies two additional nonconformances with Code requirements occurred:

- The Data Report for the inservice inspection was not signed by the Inspector upon completion of the inservice inspection because of the unresolved procedural deficiencies.
- For lack of the signed Data Report the licensee did not submit inservice inspection reports to the NRC as required by the Code.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

Instance 1

The first instance noted dealt with Code required inspections performed on Unit 1 during the period February 12, 1982 through February 15, 1982. The subject inspections were performed by Westinghouse using Westinghouse generated procedures approved by Vepco. Westinghouse submitted the required Data Report to Vepco on April 1, 1982 and they were subsequently submitted to the ASME Authorized Inspection Agency for review and signature. The Inspection Agency did not sign the Report due to problems with the procedures used to perform the inspections. The problems were ultimately resolved in August, 1982 at which time the Report was resubmitted to the Inspection Agency. However, the Inspection Agent on site at this time was not the same Agent who was present during the inspections and for this reason was unwilling to sign the Report.

Concurrent with this last evolution, the responsibility for NDE was shifted from the Superintendent of Maintenance to the Superintendent of Technical Services with direct reporting to the Supervisor, Performance and Test. When the Inspection Agent did not sign the Report, the NDE personnel forwarded it to the Supervisor, Performance and Test. The Report was inadvertently set aside and immediate action was not taken to resolve the issue. The issue was not resurrected until December, 1983, when the Report was rediscovered. Once it was determined that the required signatures had not been obtained, a Station Deviation was submitted, (January 26, 1984). The Inspection Agent, again a different one than in 1983, signed the Report February 14, 1984, and the SNSOC reviewed the Report and associated Code Inservice Inspection report on February 16, 1984.

Instance 2

The July 21, 1983 letter noted in the violation, addressed ultrasonic examination procedures generated by Westinghouse and approved by Vepco. Station review of the subject letter concluded that resolution of the problem identified by the Inspection Agency was the responsibility of the Vepco corporate NDE Level III certified individual. Discussions between the Vepco corporate NDE Level III certified individual and the Inspection Agency resulted in the agreement that the procedures did in fact require revision. Since Westinghouse was the author of the procedures, they were contacted and asked to make the necessary modifications. Vepco's understanding at the time was that this would be done and in a timely manner. However, this was not the case and repeated communication with Westinghouse did not resolve the issue. During this time, the procedures were used for inspections on Unit 2 which were completed September 28, 1983. As stated in their letter of July 21, 1983, the Inspection Agent did not sign the reports for these inspections because the procedures had not been changed. It should be noted that the problems identified with the procedures did not affect the validity or accuracy of the inspections performed.

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

Prior to submitting the documents in Instance 1 to the NRC, a review was conducted to ensure no other inservice inspection reports had been improperly processed. The review was completed in March, 1984, and identified two other reports which had not been submitted to the NRC. All three reports were then forwarded to the NRC on March 28, 1984.

In March, 1984, an agreement was reached with the ANI that pending deletion of the procedures, the reports referred to in Instance 2 would be signed. The reports were signed by the ANI on March 7, 1984, reviewed by the Station Nuclear Safety and Operating Committee on March 15, 1984 and forwarded to the NRC on March 28, 1984.

A Corporate ISI Manual has been implemented which provides more detailed administrative controls over all aspects of the ISI program.

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

Although the implementation of the ISI Manual will aid in preventing recurrence, one weakness which still exists is an adequate method for handling procedural deficiencies identified by the Inspection Agency. The Manual will be changed by May 12, 1984, to provide this capability.

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

Full compliance has been achieved with the submittal of the required Reports to the NRC. However, the implementation of the changes delineated in 4 above will ensure compliance in the future.