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April 1, 1985



VIRGINIA POWER

Dr. J. Nelson Grace  
Regional Administrator  
Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30323

Serial No. 85-168  
NO/HLM:dn  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Dr. Grace:

We have reviewed your letter of March 1, 1985 in reference to the inspection conducted at Surry Power Station on January 5, 1985 - February 8, 1985 and reported in IE Inspection Report Nos. 50-280/85-01 and 50-281/85-01. Our responses to the specific violations are attached.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power 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: (w/attachment)

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 NOS. 50-280/85-01 and 50-281/85-01

VIOLATION

- a. Technical Specification, Table 4.1-1, Item 35 requires monthly testing of the control room chlorine detectors.

Contrary to the above, the control room detectors were not tested between October 15, 1984, when the Technical Specification Amendment 100 was issued and January 30, 1985.

- b. Technical Specification, Table 4.1-2A, Item 20.6 requires a monthly channel functional test of the Unit 1 Containment Hydrogen Analyzers.

Contrary to the above, the Unit 1 Containment Hydrogen Analyzers were not tested between December 25, 1984, when Unit 1 was restarted, and February 13, 1985, at which time the testing was performed. The testing grace period expired on February 2, 1985.

These are two examples of a Severity Level IV Violation (Supplement I) and apply to Unit 1.

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

The violation resulted from a failure to follow station administrative procedures which specify responsibilities for implementing Technical Specification (TS) surveillance requirements and updating station procedures upon issuance of TS amendments.

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

A review of station records indicates that the chlorine detectors were operable during the period of missed surveillance and surveillance was performed on January 30, 1985. Station procedures have been updated to incorporate the TS surveillance requirements for control room chlorine detectors.

A review of station records indicates that the the Unit 1 containment hydrogen analyzers were operable during the period of missed surveillance testing and were calibrated on February 15, 1985.

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

In the second quarter of 1984 a contractor for Virginia Power conducted a review to determine Surry Power Station (SPS) compliance with TS surveillance requirements. This review included surveillance requirements through Amendment Nos. 95 (Surry, Unit 1) and 94 (Surry, Unit 2) of the Surry TS. As a result of the station deviation on the control room chlorine detector, a similar review was initiated for amendments received subsequent to that time.

Station surveillance procedures are being updated to incorporate the TS requirements for the containment hydrogen analyzers.

In addition, a review of station administrative procedures identified areas where administrative controls could be strengthened. ADM-24, Adherence to Technical Specifications, ADM-51, Document Control, and ADM-60, Station Procedures, will be reviewed and revised where necessary to strengthen administrative controls for review of TS amendments and their implementation.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- a. Administrative procedures will be revised by June 30, 1985.
- b. Station procedures for surveillance requirements of the containment hydrogen analyzers will be revised by May 1, 1985.

## VIOLATION

Technical Specifications 6.4.A.1 and 6.4.D require that the detailed written procedures with appropriate checkoff lists and instructions for the normal startup, operation, and shutdown of a unit shall be followed.

Contrary to the above, Operating Procedure 1-OP-1C, Estimated Rod Bank Position, was not followed on January 27 and 28, 1985. When criticality was not achieved within the predicted control rod position administrative limits, the control rods were not inserted and the Estimated Critical Position re-evaluated as required by the procedure.

This is Severity Level IV 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 reason for this violation is failure of personnel to follow administrative procedures for procedure deviations. A management review of the events determined that proper judgment was applied and appropriate actions taken except that the procedure for deviating procedures was not strictly followed.

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

Operations personnel have been reinstructed regarding procedure use and actions to be taken should a variance be required.

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

Additional actions to be taken will include modifying OP-1.4, Unit Startup Operation, to provide further guidance on evaluating Estimated Critical Position discrepancies.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.