

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 6, 1996

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 96-534
SPS/BCB/GDM R3.0
Docket Nos. 50-280
License Nos. DPR-32

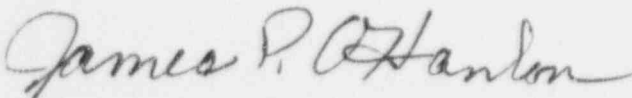
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/96-09 AND 50-281/96-09

We have reviewed your Inspection Report Nos. 50-280/96-09 and 50-281/96-09 dated October 7, 1996, and the enclosed Notice of Violation (NOV) for Surry Unit 1. The report identified one cited violation for the failure to adequately implement the design change process. As described in our attached reply to the NOV, we have concluded that this event was caused by a failure to follow procedures due to personnel errors that occurred during the preparation and implementation of a design change package. These personnel errors occurred during the early 1990s and were not detected or corrected by Engineering's oversight of the design change process. Although the errors occurred several years ago and the design change process has since been enhanced, we are conducting training sessions to discuss the lessons learned from this event and to stress the importance of adhering to design standards. In addition, we are continuing our human performance improvement efforts, which have been a focus area in 1996.

We have no objection to this letter being made a part of the public record. Please contact us if you have any questions or require additional information.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

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IED 11/

cc: U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED JULY 28 - SEPTEMBER 7, 1996
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/96-09 AND 50-281/96-09

NRC COMMENT:

"During an NRC inspection conducted on July 28 - September 7, 1996, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions,' NUREG-1600, the violation is listed below:

10 CFR 50, Appendix B, Criterion V, states that activities affecting quality shall be prescribed by documented instructions or drawings of a type appropriate to the circumstances.

This requirement was implemented by Virginia Electric and Power Company Operational Quality Assurance Program Topical Report VEP-1-5A (updated), revision 25, dated January 1996, Section 17.2.5, Instructions, Procedures, and Drawings.

Contrary to the above, during 1993, an activity affecting quality was not prescribed by documented instructions or drawings of a type appropriate to the circumstances. Set points for safety-related molded-case circuit breakers were not specified by Engineering personnel in Design Change Package DCP 90-008. This resulted in circuit breakers 1-EPL-MCC-1K2-1B and -2F having set points adjusted incorrectly. This caused premature tripping of the breakers.

This is a Severity Level IV violation (Supplement I)."

REPLY TO A NOTICE OF VIOLATION
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1. Reason for the Violation, or, if Contested, the Basis for Disputing the Violation

The violation is correct as stated. The violation was caused by the failure to follow procedures due to personnel errors that occurred during the preparation, review and implementation of Design Change Package (DCP) No. 90-008, which included the installation of molded case circuit breakers (MCCB) 1-EP-BKR-1K2-1B and 1-EP-BKR-1K2-2F. These personnel errors occurred during the early 1990s and were not detected or corrected by Engineering's oversight of the design change process.

DCP 90-008 upgraded the control room envelope air conditioning system. The DCP was prepared and independently reviewed by an architect/engineering firm for Virginia Electric and Power Company in accordance with General Nuclear Standard STD-GN-0001, "Instructions for DCP Preparation." STD-GN-0001 invokes electrical standards for the determination of breaker settings as part of the DCP development process. However, the requirements of these electrical standards were not fully implemented in that the instantaneous magnetic trip setting for the subject breakers was not specified in the DCP. Apparently, the DCP preparer and independent reviewer did not realize that a trip setting needed to be specified since the MCCBs typically installed at the station do not have an adjustable trip setting.

During preparation for post-installation testing in 1993, the engineering testing group recognized that trip setting information was needed for the subject breakers and contacted the breaker vendor to obtain the breaker setting. Although obtaining vendor input is not atypical in such situations, these inquiries are required to be coordinated through the design organization by way of an Installation Problem Report (IPR). The breaker vendor provided instructions and recommendations for establishing the instantaneous magnetic trip setting for the subject breakers. However, the vendor information was not consistent with Electrical Engineering Nuclear Standard STD-EEN-0011, "Standard for Protective Device Settings."

2. Corrective Steps Which Have Been Taken and the Results Achieved

Engineering reviewed the safety significance of the improper breaker settings and concluded that this condition did not prevent the main control room chillers from performing their design function.

The instantaneous magnetic trip setting for the subject breakers was reset in accordance with STD-EEN-0011.

Engineering reviewed the types of installed station breakers and concluded that, with the exception of six other breakers installed by DCP 90-008, there are no other breakers with a trip setting adjustment similar to 1-EP-BKR-1K2-1B and 1-EP-BKR-1K2-2F. A review of the trip settings for these six breakers identified that four were set incorrectly, as a result of the personnel errors discussed in Section 1. The trip setting for these four breakers was reset in accordance with STD-EEN-0011.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

Engineering supervision is conducting training sessions for personnel involved in the design change process to discuss the lessons learned from this violation and to reinforce the requirements of General Nuclear Standard STD-GN-0001. This training will be completed in November 1996.

4. The Date When Full Compliance Will be Achieved

Full compliance was achieved when the breakers were reset in accordance with STD-EEN-0011.