

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 26, 1996

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

Serial No. 96-564
SPS:BAG/GDM R2
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

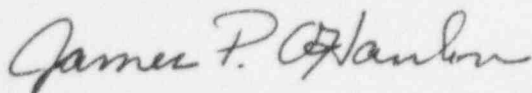
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1 AND UNIT 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/96-10 AND 50-281/96-10

We have reviewed Inspection Report Nos. 50-280/96-10 and 50-281/96-10 dated October 28, 1996, and the enclosed Notice of Violation for Surry Units 1 and 2. The report identified one cited violation for the failure to rotate the shaft of two stored electric motors as required by the quarterly preventive maintenance (PM) procedure. As discussed in our attached response, we have taken corrective actions to strengthen the PM procedure and to ensure that electric motors are being properly stored.

While the cited violation was specific to preventive maintenance on the stored Appendix R electric motors, we are also reviewing the storage and preventive maintenance requirements for other rotating equipment placed in storage that are important to safety. This review will verify that applicable storage and PM requirements are appropriately specified and implemented for this equipment.

We have no objection to this letter being made 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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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 SEPTEMBER 8 - SEPTEMBER 28, 1996
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/96-10 AND 50-281/96-10

NRC COMMENT:

"During an NRC inspection conducted on September 8 through September 28, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification (TS) 6.4.A.7 requires that written procedures with appropriate check-off lists and instructions shall be provided for the preventive or corrective maintenance operations which would have an effect on the safety of the reactor. Additionally, TS 6.4.D requires that all procedures described in Specifications 6.4.A and 6.4.B shall be followed.

Site Procedure 0-EPM-2302-01, Quarterly Inspection of Stored Motors, revision 1, Section 6.2, Inspection of Spare Electrical and Appendix R Motors, states, in part, ".....rotate [electric motor] shaft two turns at each quarterly inspection..... and section 7.2.1.C, Acceptance Criteria, states Motor shaft rotation is acceptable (Steps 6.2.3), Acceptable: _____ (Yes or No)."

Contrary to the above, from September 1991 until September 27, 1996, Procedure 0-EPM-2302-01 was not followed. The shafts for two large electric motors stored in the warehouse had not been rotated at least two turns each quarterly inspection.

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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED SEPTEMBER 8 - SEPTEMBER 28, 1996
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/96-10 AND 50-281/96-10

1. Reason for the Violation, or, if Contested, the Basis for Disputing the Violation

The violation is correct as stated. The reason for the violation was failure to follow procedure.

Preventive Maintenance (PM) requirements for stored electric motors are incorporated into the Station PM program utilizing procedure 0-EPM-2302-01, "Quarterly Inspection of Stored Motors." This procedure was approved in June 1990 and required the shafts of all stored motors to be rotated two turns and stopped at a position different from the original position. In October 1990, a change to the procedure was approved to permit the user to disregard the requirement to rotate the motor shafts if the design, configuration, or keyway visibility prevented shaft rotation. The change was made because some motors in the PM program were fitted with brakes that would not allow the shaft to rotate. This conditional step was incorporated into step 6.2.3 of the current revision of procedure 0-EPM-2302-01 (revision 1) and was used in subsequent PMs to omit the shaft rotation requirement if the reasons cited above prevented the shafts from being rotated.

Two safety related electric motors for the component cooling pumps were transferred to the station warehouse in 1984 and placed in storage as spare motors for the Appendix R Program. During the transfer, oil was drained from the motors and a label was placed on the motors warning personnel not to rotate the shaft without oil in the bearing. No storage requirements were specified for the motors at that time, and oil was not added to the motors. Consequently, when the quarterly PM was being performed for the two electric motors, the electrician determined that without oil, the motor was not in a configuration to rotate the shaft. The Acceptance Criteria in Step 7.2.1 was met since the motors could not be rotated in their current condition. However, this represented a failure to follow procedure since the lack of oil in the motor was not a design, configuration or keyway visibility item, and should have been evaluated, corrected, and the motor shafts rotated.

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

On September 26, 1996, oil was added to the two spare safety related electric motors for the component cooling pumps and the motor shafts were rotated. The motor shafts rotated without restriction indicating that there was no adverse

impact due to the storage of the motors without oil and without shaft rotation. Based on the freedom of rotation, the motors are considered capable of performing their intended function.

In addition, other spare motors not rotated during the September 3, 1996, quarterly inspection were identified during the procedure review and were rotated to return to procedural compliance.

Station procedure 0-EPM-2302-01, "Quarterly Inspection of Stored Motors," was changed to require motor shaft rotation or to require the initiation of corrective actions if the motor shaft can not be rotated. As an enhancement, the procedure was changed to identify the Appendix R spare motors and to separate their inspection and documentation from other stock motors.

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

An assessment of the current storage and preventative maintenance requirements for other stored electric motors will be completed and the PM procedure upgraded, as required.

The storage and PM requirements for rotating equipment in storage and important to safety will be reviewed to verify that applicable storage and PM requirements are being appropriately specified and implemented.

4. The Date When Full Compliance Will be Achieved

Full compliance was achieved with respect to PM procedure compliance when spare motors not rotated during the September 3, 1996, quarterly inspection were rotated and when the PM procedure was modified to specify motor shaft rotation for all appropriate electric motors.