

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 24, 1979

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USNRC REGION II
ATLANTA, GEORGIA

Mr. James P. O'Reilly
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 347
PO/FHT:baw
Docket No: 50-280
50-281
License No: DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of May 1, 1979, in reference to the inspection conducted at Surry Power Station Units 1 and 2 on February 13-16, 1979, and reported in IE Inspection Report Nos. 50-280/79-08 and 50-281/79-09. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure.

Very truly yours,

W.C. Stallings

C. M. Stallings
Vice President-Power Supply
and Production Operations

Attachment

cc: Mr. Albert Schwencer

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RESPONSES TO INFRACTIONS LISTED IN
I.E. INSPECTION REPORT NOS. 50-280/79-08
& 50-281/79-09

A. NRC COMMENT:

As required by 10 CFR 50, Appendix B, Criterion VIII, "Measures shall be established for the identification and control of materials, parts, and components, including partially fabricated assemblies. These measures shall assure that identification of the item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication, erection, installation, and use of the item. These identification and control measures shall be designed to prevent the use of incorrect or defective material, parts and components". The accepted Quality Assurance Program (FSAR 17.2), Section 17.2.8 states in part, "...Replacement materials, parts and components including partially fabricated subassemblies, are adequately and properly identified to allow control and traceability to pertinent quality control records....".

Contrary to the above, large amounts of uncontrolled and unidentified materials, components, and parts were stored in the level B warehouse where the majority of the power plant's replacement materials, components and parts for safety-related systems are stored. These uncontrolled and unidentified materials, components and parts were not part of the warehouse inventory stock and could allow the inadvertent introduction into safety-related systems without proper identification, qualification and traceability.

B. RESPONSE:

The item as stated is correct.

1. Corrective Steps which have been taken and results achieved.

All materials constituting the "uncontrolled and unidentified" above have been inventoried and placed under warehouse control.

2. Corrective steps which will be taken to avoid further non-compliance:

Any materials which are placed in the warehouse will be properly identified and under warehouse control.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

RESPONSES TO INFRACTIONS (CONTINUED)

A. NRC COMMENT:

As required by 10 CFR 50, Appendix B, Criterion XVII, "...records shall be maintained to furnish evidence of activities affecting quality...". The accepted Quality Assurance Program (FSAR Chapter 17.2), Section 17.2.17 states in part, "These records include plant history; operating logs; principle maintenance and modification activities..."

Contrary to the above, records documenting materials, parts and components used on safety-related components could not be located in that three of ten maintenance reports completed during 1978 selected at random of three safety-related systems did not provide nor lead to the required traceability of materials used.

B. RESPONSE:

The item as stated is correct.

1. Corrective steps which have been taken and results achieved:

Instructions have been issued to all maintenance and stores personnel that prior to issuance of material from the station storeroom or warehouse, the Maintenance Request No. must be recorded against the material identification number on stores issue form #97483030. This will insure proper material history associated with safety related systems and component maintenance.

2. Corrective steps which will be taken to avoid further non-compliance:

The actions taken above will preclude further non-compliance.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

A. NRC COMMENT:

As required by 10 CFR 50 Appendix B, Criterion V states in part that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances. The accepted Quality Assurance Program (FSAR Chapter 17.2), Table 17.2.0, lists ANSI 45.2.2.1972, which states, "VEPCO's program meets this standard, as applicable to the Operational Phase". Section 6.4.2 of the committed standard states in part, ".....Items in storage shall have all covers, caps, plugs or other closures intact". "Rotating electrical equipment shall be given insulation resistance tests on a scheduled basis..." "...Shafts of rotating equipment shall be rotated on a periodic basis..."

Contrary to the above, there existed no Preventative Maintenance Procedures to provide for the care of safety-related items in storage in that pipes were not capped, motors were not being tested for insulation resistance, and equipment shafts were not being rotated.

RESPONSES TO INFRACTIONS (CONTINUED)

B. RESPONSE:

The item as stated is correct.

1. Corrective steps which have been taken and results achieved:

- a. An electrical maintenance procedure for the case of stored electrical motors is being prepared.
- b. A review of all electrical motors under warehouse control will be conducted and a listing generated of those requiring insulation maintenance testing and shaft rotation on a scheduled basis.
- c. Warehouse personnel will be instructed in the technique to be applied to electrical motors to insure that they are placed in the preventative maintenance program.
- d. An inventory of the number size and type of caps required to accomplish the capping of stored pipes has been completed. The caps have been ordered and will be installed as their receipt allows.

2. Corrective steps which will be taken to avoid further non-compliance:

The action taken above will resolve further non-compliance.

3. Date when full compliance will be achieved:

Full compliance will be achieved by August 31, 1979.