



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-280/79-19 and 50-281/79-28

Licensee: Virginia Electric and Power Company
P. O. Box 26666
Richmond, Virginia 23261

Facility Name: Surry Power Station

Docket Nos. 50-280 and 50-281

License Nos. DPR-32 and DPR-37

Inspection at Surry, Virginia

Inspector: S. A. Elrod
S. A. Elrod

30 May 79
Date Signed

Accompanying Personnel: C. M. Hese (paragraph 7)

Approved by: P. J. Kellogg
P. J. Kellogg, Section Chief, RONS Branch

May 30 1979
Date Signed

SUMMARY

Inspection on April 16 - 19, 1979

Areas Inspected

This routine, unannounced inspection involved 27 1/2 inspector-hours onsite in the areas of Seismic Reanalysis of Safety Related Piping; Unit 2 Retest Program; Radiation Work Permit Documentation; and Radiation exposure report for the steam generator repair program.

Results

Of the four areas inspected, no apparent items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

Licensee Employees

- *W. L. Stewart, Station Manager
- *T. A. Peebles, Superintendent Technical Services
- *R. M. Smith, Supervisor Health Physics
- *R. F. Saunders, Superintendent Maintenance
- *J. L. Wilson, Superintendent Operations
- *D. Kildoo, Q. C. Engineer
- *R. L. Baldwin, Supervisor Administrative Services
- *E. P. Dewandel, Staff Assistant
- F. L. Rentz, Resident Q. C. Engineer
- S. P. Sarver, Production Operations Department

Other Organizations

- R. Dahlborg, Stone and Webster
- R. J. Wood, Stone and Webster, Engineering Assurance

NRC Resident Inspector

- *D. J. Burke

*Attended exit interview.

2. Exit Interview

The inspection scope and findings were summarized on April 19, 1979 with those persons indicated in Paragraph 1 above. The items listed in paragraphs 5-8 of this report were discussed. The licensee stated that they believed the inspectors concern about collection of data for the license condition report was premature (paragraph 8).

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. New unresolved items identified during this inspection are discussed in paragraph 7.

5. Unit 2 Retest Program

License amendments 47 and 46 (Steam Generator Repair Program) to the Operating License for the Surry Power Station Unit Nos. 1 and 2, respectively, have added certain license conditions which include the requirement that sixty days prior to fuel loading, the program for pre-operational testing and startup shall be submitted for NRC review. Since the station staff indicated that fuel load might occur near the end of July, which would place test program submittal near the end of May - about six weeks from the present, the inspector inquired of licensee management into the progress of test program preparations. Formal preparations have not yet commenced, however, a coordinator was assigned on April 16, 1979. Licensee management indicated that it was anticipated that the test program would be submitted "on time". The inspector had no further questions at this time.

No deviations or noncompliance were identified in this area.

6. Seismic Reanalysis of Safety Related Piping

The major site activity in this area is to verify and correct, if necessary, the isometric sketches (drawings) used as a basis for the inputs to the computer analysis being accomplished by Stone and Webster (S&W) Co. in Boston, Massachusetts. This activity is under the control of the licensee with assistance from S&W engineering and Quality Engineering Departments. Two iterations of drawing update and verification have been completed to date (over 100 drawings each) and the licensee is pursuing a third iteration for most drawings for the following reasons:

- a. VEPCO and S&W surveillance of 26 (so far) of the latest drawings indicate that at least some discrepancies exist between the latest drawing and the actual installation in 23 of 26 drawings.
- b. S&W (Boston) requested clarification or additional information concerning about 20 drawings.
- c. VEPCO Audit 579-2 indicated that 25% of the 20 drawings audited had translation errors between the work copy submitted to Boston and the revised copy that was returned.

Guidance for the first two iterations was provided by S&W by memorandum, which appears to have been adequate for the state of the activity at the time. Written direction covering future activities has not been issued yet but is planned. The inspector emphasized that a written procedure should be issued covering how the licensee is going to advance from the present state of the project to completion and certification. It is understood that the site quality control

organization is planning surveillance of 100% of the drawings based on the number of discrepancies found to date. The inspector emphasized that the credibility of the drawings used in the finished project must be very high. No deviations or items of noncompliance were identified in this area.

7. Radiation Work Permit (RWP) Documentation

The license amendment submittal titled "Steam Generator Repair Program, Surry Power Station Unit Nos. 1 and 2", Section 6, Table 6-1, Item 3.a(8), Pages T6-1-30, T6-1-31, commits the licensee to maintain several categories of information on RWP's for the Steam Generator Repair Project. The inspector reviewed several completed RWP's to verify that the licensee was meeting his commitments. Reviewed RWP's and the number of associated engineering task assignments are:

Engineering Task Assignment	Radiation Work Permit
30024	RWP-SGRP-9-129
30030	RWP-SGRP-9-128
30005	RWP-SGRP-9-126
30005	RWP-SGRP-9-109
30005	RWP-SGRP-9-195
30005	RWP-SGRP-9-65

Included in the information the licensee committed to record was the identification of personnel working on the tasks (item (b)) and the actual exposure time, doses and other information obtained during the operation (item (j)). For the RWP's reviewed, the identification of personnel working on the tasks, the actual exposure time, and doses were not recorded. This also appears to significantly handicap the licensee in meeting other commitments and license conditions such as:

- a. SGRP Page T6-1-36, Item 3.C.(2), Licensee committed to analyze work permit data.
- b. SGRP Page T6-1-36, Item 3.C.(5), Licensee committed to compare exposure data obtained with estimated exposures and use this for planning the activities of the other unit.
- c. License condition (a limiting condition for the SGRP) 2d(1) requires a summary of occupational exposure expended to date using the format and detail of table 5.3-1 of the SGRP license

amendment submittal. This is a detailed table which breaks the overall job into small tasks . This item is discussed further in paragraph 8 of this report.

Unresolved Item: This matter of failure to record all the information in SGRP T6-1-3.C.(8) is unresolved pending further evaluation of the licensee's efforts to retrieve the information from other sources (281/79-28-01).

8. Radiation Exposure Report for the Steam Generator Repair Program

License amendments 47 and 46, respectively, to the operating license for Surry Power Station Unit Nos. 1 and 2 have several conditions of the license. Condition (2)(d) requires a progress report based on 60 day intervals. At the time of this inspection, the reporting period was complete but the due date for submittal to the NRC had not passed.

Another inspector's report 50-281/79-19, Details paragraph 6, had indicated that the main problem with exposure data was the inability to continuously track man-rem data for the various jobs for use as management tool due to a computer problem, but that the raw data was being kept of actual exposures to provide input for the 60 day report to the Commission.

During management interviews as part of this inspection, the Health Physics Supervisor indicated that the real problem was that the licensee had been unable to obtain from his contractor on a reliable basis the information of what tasks individual workmen had been assigned to. For example, the licensee makes a list daily of who received exposure. The corresponding list from the contractor of what projects the workmen are assigned omitted an average of 50% of those receiving exposure. It was indicated that the past efforts to recapture this information were fruitless. As of the completion of this inspection new efforts are being attempted.

Since direct records of individual exposure related to job/ task appear to be presently unavailable for Daniels Construction personnel, the licensee indicated that they were presently estimating exposure-per-job from known data:

- a. Financial charges by Daniels Construction (not identified by person, or time in radiation area)
- b. Total man-rem expended by Daniels personnel

c. Average radiation area at primary job site

The inspector questioned whether this approach meets the limiting condition of the license amendment. This item will be evaluated further upon receipt of the subject report (281/79-28-02).