

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 26, 1979

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

Serial No. 1133/120579
PO/RMT:baw
Docket No. 50-281
License No. DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of December 5, 1979, in reference to the inspection conducted at Surry Power Station Unit 2 on October 31 - November 2, 1979, and reported in IE Inspection Report No. 50-281/79-81. Our responses to the specific infractions are attached.

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

Very truly yours,

C. M. Stallings

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

Attachment

cc: Mr. Albert Schwencer

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RESPONSE TO INSPECTION REPORT

NO. 50-281/79-81

A. NRC COMMENT

As required by 10 CFR 50, Appendix B, Criterion XIII, "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage and deterioration". Daniel Construction procedure WP-109 Revision 1, paragraph 3.8 states in part, "Rigging practices shall follow generally accepted standards to insure the safety of personnel and the proper usage of equipment".

Contrary to the above, the following examples were observed:

1. The construction craft was rigging a large section of shroud coolant pipe from the "C" steam generator feedwater piping.
2. The construction craft was rigging ventilation piping and ductwork from the "C" steam generator reactor coolant pump seismic supports.

This is an infraction.

RESPONSE

The infraction is correct as stated.

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

- a. The feedwater pipe was inspected for damage. Since the load being rigged was less than 500 lbs., no damage resulted and no repairs were necessary.
- b. The R. C. pump support was inspected for damage. Since the load being rigged was less than 500 lbs., no damage resulted and no repairs were necessary.

2. Corrective steps taken to avoid further infractions:

The individuals involved in the rigging operation were reprimanded and re-instructed in the use of proper rigging techniques.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

RESPONSE TO IR 50-281/79-81-01 (con't'd.)

B. NRC COMMENT

As required by 10 CFR 50, Appendix B, Criterion II, "Activities affecting quality shall be accomplished under suitable control conditions. Controlled conditions include the use of appropriate equipment; suitable environment conditions for accomplishing the activity, such as adequate cleanliness; and assurance that all prerequisites for the given activity have been satisfied". VEPCO Topical Report VEP-1-A, Amendment 3, paragraph 17.1.0.2 states that VEPCO operational quality assurance program conforms to ANSI N45.2.2. Paragraph 5 of ANSI N45.2.2 states in part, "The installation process represents an opportunity for the introduction of contaminants into a clean item and care should be taken to minimize contamination. Openings and pipe ends shall be sealed at all times except when they must be unsealed to carry out necessary operations".

Contrary to the above, the following examples were observed: a total of eight (8) flanged nipples on reactor coolant pumps were left uncapped and unattended. These nipples are the seal water coolant lines to the pump seals. Work was in progress in the containment could have allowed foreign material to enter reactor coolant pump seal areas.

This is an infraction.

RESPONSE

The infraction is correct as stated.

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

The openings were verified free of foreign materials and capped.

2. Corrective steps which will be taken to avoid further infractions:

Contractor personnel working on the pumps were informed of the importance of keeping the system boundaries capped.

3. Date when full compliance will be achieved:

Full compliance has been achieved.