

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. 1007/120379
EO/RMT:baw
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of December 3, 1979 in reference to the inspection conducted at Surry Power Station Unit Nos. 1 and 2 on October 1-31, 1979 and reported in IE Inspection Report Nos. 50-280/79-62 and 50-281/79-82. 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,

C. M. Stallings

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

Attachment

cc: Mr. Albert Schwencer

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RESPONSE TO VIOLATIONS
LISTED IN IE INSPECTION REPORT
50-280/79-62
50-281/79-82

NRC COMMENT:

- A. As required by T.S. 6.4.0, the detailed written procedures for actions to be taken for specific and unforeseen malfunctions of systems or components, including alarms, shall be followed.

Contrary to the above, on October 17, 1979, Annunciator Alarm procedure IB-26(D-2), "Recirculation Spray Pit B High Level" was not followed after the inspector verified excessive water (over 14 inches) in the Safeguards valve sump and pit and the alarmed annunciator D-2 on the Unit 1 control room panel B. Although the alarm had been annunciated for several days, and not documented, operator action to verify the water levels, the source of the water, the proper operation of the drain and sump pumps, and to remove the water, was not taken.

This is an infraction.

RESPONSE:

The infraction is correct as stated. None of the equipment in this area was made inoperable by the water. The evaluation and the action taken were consistent with the operability of equipment and repairs to the pumping system. However, this was not documented.

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

The pit was pumped down. An Annunciator Log procedure has been established to document safety-related annunciator actuations and resets. The importance for review of the Annunciator procedures and taking corrective actions as required was stressed to all Operations personnel.

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

The above steps will avoid further non-compliance. In addition, increased emphasis will be applied in SRO and RO retraining sessions on adherence to Annunciator procedures, and proper documentation.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

NRC COMMENT:

- B. As required by Technical Specification 3.1.B, the reactor coolant system (RCS) cooldown rate shall not exceed 50°F per hour for temperatures below 440°F.

NRC COMMENT (con't)

Contrary to the above, on October 5, 1978, the RCS cooldown rate, as measured by the wide range hot leg temperature recorder TR-1-413, exceeded the limit by some 10°F for the following one-hour periods: 3:30 pm to 4:30 PM - 390°F to 330°F, and 7:00 pm to 8:00 PM - 260°F to 200°F.

This is an infraction.

RESPONSE:

The infraction is correct as stated.

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

No corrective action required.

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

The present procedure (OP-3.2) has the max. allowable cooldown rate and the present standing order (1/18/77) provides the operator with guidance to monitor and document the cooldown rate.

In addition, increased emphasis will be applied in SRO and RO retraining sessions on maximum allowable cooldown rates, how to monitor the rate, and methods to control the rate of cooldown to stay within limits.

3. The date when full compliance will be achieved.

Full compliance has been achieved.

NRC COMMENT:

- C. As required by Technical Specification 3.7, Table 3.7-5, Item 2, the component cooling water radiation monitors RM-CC-105 and 106 shall be set to alarm at twice background or less.

Contrary to the above, on October 29, 1979, RM-CC-105 and RM-CC-106 radiation monitors were set to alarm at approximately ten times background due to the decrease in activity in the component cooling water; the alarm setpoint was not reduced as the background decreased.

This is an infraction.

RESPONSE:

The item is correct as stated.

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

The radiation monitors were reset to the lowered setpoints.

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

RESPONSE: (con't)

The daily periodic test will be changed to incorporate a review of the setpoints.

3. The date when full compliance will be achieved:

Full compliance will be achieved by January 1, 1980.

NRC COMMENT:

Table E-3 in Part IV of the Surry Fire Protection Systems Review and revisions states that the specified portable fire extinguishers are installed and maintained in accordance with NFPA 10, which requires monthly inspections (Section 4-3.1).

Contrary to the above, on October 25, 1979, one of the two portable fire extinguishers in each of the Safeguards valve pit areas for Units 1 and 2 were found not inspected since January 1979 (Fire Extinguishers #94 and #131).

This is a deviation.

RESPONSE:

The deviation is correct as stated.

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

Fire extinguishers #94 and #131 were inspected and tags properly annotated.

2. Corrective steps taken to avoid further deviations:

Fire extinguishers #94 and #131 have been added to monthly surveillance requirements.

3. Date when full compliance will be achieved:

Full compliance has been achieved.