

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

USNRO REGION 2
MARTA, GEORGIA

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January 25, 1980

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

Serial No. 018/123179
PO/RMT:baw
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Mr. O'Reilly:

I reviewed your letter of December 31, 1979 in reference to the
inspection conducted at Surry Power Station Unit Nos. 1 & 2 on
December 26-30, 1979 and reported in IE Inspection Report Nos. 50-280/79-65
50-281/79-85. Our responses to the specific violations 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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OFFICIAL COPY

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RESPONSE TO INSPECTION REPORT NOS.

50-280/79-65 & 50-281/79-85

A. NRC COMMENTS:

As required by 10 CFR 50, Appendix B, Criterion V (Instructions, Procedures, and Drawings), "Activities affecting quality shall be prescribed by documented instructions...and shall be accomplished in accordance with the instructions" The accepted quality assurance program, VEP-1-3A, Section 17.2.11, states in part, "The authority and responsibilities related to the test program are delineated in the Nuclear Power Station Quality Assurance Manual (NPSQAM)." the NPSQAM Section II, Paragraph 5.3.4 states that the individual performing a periodic test (PT) is responsible for initialing each step and affixing his signature and date on the procedure in ink upon completion of the test. Section, 11.5.3.5 of the Manual states that the cognizant supervisor and performance engineer are responsible for reviewing the test, including critique sheet and procedure, for completeness and accuracy. Technical Specification 6.5 requires that these PT records be retained for five years.

Contrary to the above, Sections 1 through 6 of PT's 2.1 through 2.11 generated between 1/1/79 and 11/27/79, were not reviewed by the cognizant supervisor and performance engineer, initialed and signed in ink, and retained in the station file room for five years.

This is a deficiency.

RESPONSE:

The deficiency is correct as stated.

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

All steps performed in the Periodic Test are now signed in ink and the entire package is reviewed by the cognizant supervisor and performance engineer for completeness and technical merit prior to filing in the records vault.

2. Corrective steps taken to avoid further deficiencies:

Along with item 1 above, all appropriate personnel have been re-instructed to insure all steps are initialed in ink, all sections are completed, and that the requirements of the acceptance criteria are met prior to forwarding for cognizant supervisor and performance engineer's reviews.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

B. NRC COMMENT:

As required by Technical Specification 6.4.D, PT procedures shall be followed. Section 6.1 of PT-18.6 (Monthly Testing of Safety-Related MOV's) required the individual performing the PT to submit a station deviation if any test value exceeds the 25% limit given in the procedure, and to note the deviation on the critique sheet.

Contrary to the above, the auxiliary feed pump discharge valves (MOV-FW-151C and MOV-FW-151E) were tested on 10/13/79 and the opening time exceeded the 25% limit. No station deviation was submitted for these values and the error was not identified in the review process.

This is an infraction and is applicable to Unit 1.

RESPONSE:

The infraction is correct as stated.

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

A review has been performed of subsequent PT 18.6's run after 10/13/79. The results of the November, December, and January PT's were all within the acceptance criteria stipulated. The 10/13/79 PT was annotated with the discrepancies noted on the critique sheet. The PT results were analyzed by the ISI engineer, and based on the subsequent results, considered acceptable.

2. Corrective steps taken to avoid further infractions:

All applicable personnel have been informed as to the importance of proper review prior to forwarding. They have also been re-instructed to insure all steps are initialed, all sections complete, and that all the requirements of the acceptance criteria are met.

3. The date when full compliance will be achieved:

Full compliance has been achieved.