

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

June 23, 1980

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. 509  
NO/RMT:smv  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of May 27, 1980 in reference to the inspection conducted at Surry Power Station on April 7 through May 2, 1980 and reported in IE Inspection Report Nos. 50-280/80-19 and 50-281/80-19. 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,

Original Signed By  
B. R. SYLVIA

B. R. Sylvia  
Manager - Nuclear Operations  
and Maintenance

RMT/smv: SX1

Attachment

cc: Mr. Steven A. Varga, Chief  
NRC Office of Nuclear Reactor Regulation  
Operating Reactors Branch No. 1  
Division of Licensing  
Washington, D. C. 20555

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RESPONSE TO "NOTICE OF VIOLATION"  
REPORTED IN IE INSPECTION REPORT  
NOS. 50-280/80-19 AND 50-281/80-19

NRC COMMENT:

- A. As required by Technical Specification 6.4.A.4, detailed written procedures with appropriate check-off lists and instructions shall be provided for actions to be taken for specific and foreseen malfunctions of systems or components including alarms, primary system leaks and abnormal reactivity changes.

Contrary to the above, detailed written procedures with appropriate check-off lists and instructions have not been provided as of April 25, 1980, for actions to be taken when certain installed radiation monitoring components malfunction. Consequently, when the Unit 2 radiation monitor (RM-RMS-262) on the manipulator crane intermittently failed on April 21 and 22, 1980 during Unit 2 refueling, appropriate prompt corrective action was not taken to correct the malfunction which was indicated by loss of the green fail/reset light and mR/hr meter indication. Similarly, procedures do not exist for actions to be taken when flow or filter fault alarms occur on RM-GW-101 and RM-159, 160, 259 and 260.

This is an infraction.

RESPONSE

This violation is not correct as stated. AP series 5.16 through 5.19 specify specific actions to be taken in the event of a malfunction of RMS-GW-101, 102, 201, 202, RMS-VG-103, 104, 203, 204, RMS-RMS-159, 160, 162, 259, 260 and 262. Operation Instruction OI-1 is the procedure utilized to check lite availability. The training in this area will be emphasized during this year. With the procedures in existance prior to the notification, no further action is necessary.

SUBJECT: RESPONSE TO VIOLATIONS  
LISTED IN IE INSPECTION REPORT  
NOS. 50-280/80-19 AND 50-281/80-19

NRC COMMENT:

- B. As required by Technical Specifications 6.4.A.2 and 6.4.D, the detailed written procedures with appropriate check-off lists for the calibration and testing of instruments, components, and systems involving nuclear safety shall be followed.

Contrary to the above, Unit 2 Containment Spray Chemical Addition Flow and LHSI Venturi Flow Verification Test, conducted on April 15, 1980, to verify Design Change 77-9 modifications, was not properly followed or completed. On April 15, and 16, 1980, the following discrepancies were identified.

1. The Initial Conditions of the test required that the Safety Injection and Containment Spray Systems were available for service per OP-7.1 and OP-7.2, respectively. Valve alignment checklists OP-7.1 and 7.2 were not completed prior to the test. As a result of this, the LHSI pump 2-SI-P-1B was operated for some 30 minutes with the pump suction valve closed.
2. Step 6.1.1 of the test procedure required the RWST water pH to be between 4.0 and 4.5; the actual value was 5.4 and corrective action, deviations, or changes to the procedure were not made.
3. Step 6.2.2 of the procedure is the first of several steps for CAT flow verification which were conducted but not signed and dated.
4. Attachment IV to the procedure, which verified test instrumentation hook-ups and attachments, was not completed; none of the several steps were signed off, although the work was performed prior to conduct of the test.
5. The 13 field changes to the test were unsigned and were not approved by a licensed SRO prior to implementation of the test.

This is an infraction.

RESPONSE:

The infraction is correct as stated with the exception of Item 5. SRO's are not required to review field changes prior to implementation.

1. Corrective Steps Taken

The Containment Spray Chemical addition flow and LHSI venturi flow verification test were satisfactorily conducted on April 30. Flow and pressure parameters of 2-SI-P-1B have been verified to be within

design tolerances and the pump is also scheduled for disassembly and inspection for damage. Emphasis will be placed on critical bearing tolerances. Operators involved have been instructed on the importance of procedural compliance.

2. Corrective Action To Prevent 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 procedures, and proper documentation.

3. Date When Full Compliance Has Been Achieved

Full compliance has been achieved.