

USNRC REGION II
VIRGINIA ELECTRIC AND POWER COMPANY, GEORGIA
RICHMOND, VIRGINIA 23261

August 11, 1980 30 AUG 14 A 9:40

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. 644
NO/RMT:ms
Docket No. 50-280
50-281
License No. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of July 15, 1980, in reference to the inspection conducted at Surry Power Station on May 5 through June 6, 1980, and reported in IE Inspection Report Nos. 50-280/80-20 and 50-281/80-21. 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,


B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

cc: Mr. Steven A. Varga, Chief
Operating Reactor Branch No. 1

8-009240 701

OFFICIAL COPY

RESPONSE TO NOTICE OF VIOLATION
CONTAINED IN NRC INSPECTION REPORTS
50-280/80-20 AND 50-281/80-21

NRC COMMENT

- A. As required by Technical Specification 6.4.D, the detailed written procedures with appropriate check-off lists and instructions provided for preventive or corrective maintenance operations which would have an effect on the safety of the reactor shall be followed.

Contrary to the above, on May 19, 1980, the inspector observed that startup check sheet OP-1B had not been followed prior to Unit 1 startup. The Operating Procedure 1B checklist requires inspections to insure that containment recirculation sump screens are in place and clear of debris; on the above date, a bucket, mops, rags, plastic bags, a cardboard box and assorted trash was found adjacent to the in-place recirc. sump screens of the operating unit.

This is an infraction and applies to Unit 1. A similar item was brought to your attention in our letter dated March 28, 1979.

RESPONSE:

This item is correct as stated; however, the trash was minimal, identified by Vepco's entry team, and was removed on the same day.

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

The assorted trash has been removed. Additional emphasis has been given to insure all unnecessary material has been removed. Without specific analysis, we cannot conclude if this trash could or would not adversely affect the operability of the recirc. spray pump suction screens. The results have been effective; however, there have been no major outages since May, 1980.

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

No further action is considered necessary.

3. Date when full compliance will be achieved:

We are presently in full compliance.

NRC COMMENT

- B. As required by Criterion III of Appendix B to 10 CFR 50 and Section III of the NPS QA Manual, the design control measures provide assurance and verification of design adequacy by the performance of design reviews, the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. The design change procedure requires an engineering evaluation (safety analysis) to determine the effect on plant operation.

Contrary to the above, the accident reanalysis for Design Change No. 80-S19 was not completed and presented to station management until May 28, 1980, even though this modification of the containment recirculation spray

system had been completed prior to Unit 1 startup on May 11, 1980. Subsequent review of containment pressure and temperature revealed that Unit 1 had been operated outside the requirements of Technical Specification 3.8 on several occasions between May 11 and May 28, 1980.

This is an infraction and applies to Unit 1.

VEPCO RESPONSE:

This item is correct as stated.

1. Corrective steps taken and results achieved:

Architect-Engineer's analysis has resulted in a proposed change to the station Technical Specifications. The proposed change has been sent to the NRC for review and approval.

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

All future correspondence and analysis performed by the Architect-Engineer will be addressed to both corporate and station engineering and management for review.

All future changes to operational limiting conditions will be addressed by a Technical Specification change and temporarily controlled administratively.

3. Date when full compliance will be achieved:

Full compliance will be achieved by September 1, 1980.

NRC COMMENT

C. As required by Technical Specification 3.10.A.6, at least one residual heat removal (RHR) pump and heat exchanger shall be operable to circulate reactor coolant during refueling operations.

Contrary to the above, Periodic Test 30.2, RHR System MOV Cycling, was not performed to verify that at least one train or subsystem of the RHR system was operable prior to fuel loading on April 19, 1980. One of the four motor operated valves (MOV 2720B) in the RHR system and PT 30.2 was cycled, timed, and documented on April 20, 1980. Documentation of the remaining RHR valves was not provided although station personnel stated that the test was completed on these valves.

This is an infraction.

RESPONSE:

Incorrect as stated. Item is considered a deficiency instead of an infraction. The PT's to prove operability of the RHR system and its valves were performed. The documentation, however, cannot be located. The Superintendent of Operations had the completed PT in his possession on the date in question. The procedure, however, was lost in routing. The personnel involved in the PT performance concur the PT was satisfactorily performed with the exception of the one valve. That valve was identified in the complete procedure deviation and then subsequently performed satisfactorily.