

APPENDIX A

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry Units 1 and 2

License Nos. DPR-32 and DPR-37

Based on the NRC inspection April 7 through May 2, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated December 31, 1974.

- 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.

- 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, the 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.

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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.