

APPENDIX A

NOTICE OF VIOLATION

Virginia Electric and Power Company  
Surry 2

License No. DPR-37

Based on the NRC inspection July 7 - August 29, 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 3.7-2, Item 1.e "Engineered Safeguards Action", the high steamline flow instrumentation for actuation of Safety Injection shall be operable when the reactor is above the cold shutdown condition.

Contrary to the above, on August 19, 1980, during operation at 12% power, the six main steamline flow instruments were not operable, in that the flow transmitters were isolated and the electrical fuses were removed.

This is an infraction.

- B. As required by Technical Specification 6.4.D, detailed written procedures with appropriate check-off lists and instructions provided for operation, maintenance, calibration or testing of instruments, components, and systems involving nuclear safety shall be followed. VEPCO NPS QA Manual, Section 14, assigns responsibility for the tagging of all equipment to assure that it is performed in accordance with procedures and in a safe manner.

Contrary to the above, appropriate tagging was not performed and procedures PT 2.9 and 2.9A were not followed as required when electrical fuses were removed and the transmitters isolated on the six Unit 2 main steamline flow instruments FI 2472, 2475, 2484, 2485, and 2494 prior to Unit 2 startup. The steam flow instruments were found isolated and inoperable at 12:30 a.m. on August 19, 1980, while operating at 12% power.

This is an infraction.

- C. As required by Technical Specification 6.4.A, detailed written procedures with appropriate check-off lists and instructions shall be provided for plant operation and all systems and components involving nuclear safety of the station, and for calibration and testing of instruments, components, and systems involving nuclear safety of the station.

Contrary to the above, Periodic Test procedure No. 36, "Instrument Surveillance" was not revised prior to Unit 2 startup on August 14, 1980, to reflect changes to Technical Specifications 3.4.2.A.3 and 4 to the required levels in the refueling water storage tank (RWST) and the chemical addition

tank (CAT). The revised TS minimum levels of 96% and 97% for the RWST and CAT were denoted in the Shift Order Book, but the minimum RWST and CAT levels listed in PT 36 were 94% and 77%, respectively, and led to operation of the RWST at 95% and the CAT at 96% on August 14 and 25, 1980.

This is an infraction.

- D. As required by 10 CFR 50.72(a)(6), personnel errors on procedural inadequacies which, during normal operations, anticipated operational occurrences, or accident conditions, prevents or could prevent, by itself, the fulfillment of the safety function of those structures, systems, and components important to safety, must be reported to the NRC Operations Center by telephone as soon as possible and in all cases within one hour of the occurrence.

Contrary to the above, when the main steam flow instrumentation was found to be inoperable at 12:30 a.m. on August 19, 1980, the NRC Operations Center was not notified within one hour.

This is a deficiency.