

APPENDIX A

NOTICE OF VIOLATION

Virginia Electric & Power Co.
Surry Unit 2

Docket No. 50-281
License No. DPR-37

As a result of the inspection conducted on November 12 through November 26, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. Criterion XVI of Appendix B to 10 CFR 50, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, and nonconformances are promptly identified and corrected. Section 16 (Corrective Action) of the Vepco NPS QA Manual establishes the measures and provides procedures for identifying, correcting, and appropriately reporting conditions adverse to quality.

Contrary to the above, adequate identification and corrective actions were not taken on the following conditions adverse to quality:

1. Rainwater leaked through the Unit 2 Safeguards Building (valve pit) roof and roof plugs on November 24, 1980 onto the Low Head Safety Injection (LHSI) and Outside Recirculation Spray (ORS) pump motors and electrical components (conduit and junction boxes). The pump motors and power cables were electrically tested and the power cable to LHSI pump 2-SI-P-1A was found wet and electrically shorted. The roof leaks, which led to the conditions adverse to quality have existed since Unit 2 restart in August, 1980.
2. The six-inch Residual Heat Removal piping from the containment penetration area in the Unit 2 Safeguards Building (valve pit) had a broken floor support on November 24, 1980.
3. Several loose, missing, or broken U-bolt pipe supports on the Unit 2 charging pump service water and component cooling water systems in the area of the 2-SW-E-1B heat exchanger and flow indicators were observed on November 24, 1980.

This is a Severity Level IV Violation (Supplement I.D.3.).

- B. Technical Specification 6.4.A.7 and 6.4.D requires that the detailed written procedures provided for preventive or corrective maintenance operations which would have an effect on the safety of the reactor must be followed.

Contrary to the above, the detailed written corrective maintenance procedures EMP-C-HT-20 and MMP-C-017 were not followed in that, on November 24, 1980, several feet of the Unit 2 heat traced Boron Injection Tank (BIT) recirculation line (1" CH-230-152, upstream of TV-2884C, was not insulated. The procedures require reinstallation of insulation removed during maintenance.

This is a Severity Level V Violation (Supplement I.E.). A similar item was identified in our letter dated January 22, 1980.

Pursuant to the provisions of 10 CFR 2.201, Vepco is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: FEB 6 1981