APPENDIX A

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry 1 and 2

Docket Nos. 50-280 and 50-281
License Nos. DPR-32 and DPR-37

As a result of the inspection conducted on May 11-15 and 18-22, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

A. 10 CFR 50, Appendix B, Criterion XVI and the accepted QA Program, Section 17.2.16, require that measures shall be established to assure that conditions adverse to quality, such as failures and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.

Contrary to the above, measures have not been established to assure that failures and nonconformances (including NRC concerns) are promptly corrected. Although measures have been established to assure that the cause of the condition is determined, corrective actions have not been effective to preclude repetition as evidenced by the number of problems identified during this inspection that had been identified during the previous inspection in the same functional area (Inspection Report No. 50-280/80-10 and 50-281/80-11). Specifically, Items C, D, G and I in this Notice of Violation and Items A and B in the Notice of Deviation, were not identified by the QA Program to assure that corrective actions designed to prevent recurrence were carried out as stated in correspondence to the NRC.

This is a Severity Level V Violation (Supplement I.E).

B. Technical Specification 6.4.A.2 requires that written procedures shall be provided for the calibration and testing of instruments involving nuclear safety of the station. Technical Specification 4.18.A.1 requires that fire detection instruments listed in Table 3.21-1 be demonstrated operable:

1. At least once per six months by channel function test, and

2. At least once per twelve months by performance of channel calibration

Heat and smoke detectors are included in Table 3.21-1.

Contrary to the above, procedures issued to implement Technical Specification 4.18.A.1 do not address channel function test or channel calibration of heat detectors installed in the cable tray room, the cable tunnel and the cable vault area. In addition, the procedures do not require channel calibration of smoke detectors installed in these areas.

This is a Severity Level V Violation (Supplement I.E).

C. 10 CFR 50, Appendix B, Criterion XVII and the accepted QA Program, Section 17.2.17 require that sufficient records be maintained to furnish evidence of activities affecting quality. Section 17.2.7 of the Program requires that specific records, such as copies of purchase requisitions, become a part of the station records.

Contrary to the above, copies of quality repeating purchasing requisition cards (on which each line is a separate purchase requisition) are not being maintained in station records.

This is a Severity Level V Violation (Supplement I.E). A similar item was brought to your attention in our letter dated July 3, 1980.

D. 10 CFR 50, Appendix B, Criterion V and the accepted QA Program, Section 17.2.5 require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. ADM 51, Control of Procedures, dated January 1977, Section 51.3.2 and 51.3.3 requires that each supervisor who maintains an unused procedure depository shall establish procedures to ensure that:

1. Only current and approved procedures are in the unused depository

2. Adequate supplies of unused procedures are in hand.

Contrary to the above, as of May 11, 1981, the procedures required by ADM51 had not been established by each supervisor that maintains an unused procedure depository. Only the Operations Supervisor and Instrument and Control Supervisor had the required procedures.

This is a Severity Level V Violation (Supplement I.E).

E. 10 CFR 50, Appendix B, Criterion V and the accepted QA Program, Section 17.2.5 require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

1. The Nuclear Power Station Quality Assurance Manual, Section 12, Control of Measuring and Test Equipment, Revision 8, dated September 1980, Paragraph 5.4(b) requires that if an instrument is not located for one year after having missed a required calibration date, it shall be removed from the Quality Control (QC) Program.

Contrary to the above, 19 pieces of equipment had missed their calibration due date by more than one year but had not been removed from the QC Program.

2. The VEPCO Development Policy Manual requires that the individual trained, the supervisor, the Nuclear Training Supervisor and the Station Manager sign the end-of-step examination and the comprehensive examination given to auxiliary operators.

   Contrary to the above, the Station Manager did not sign the end-of-step examinations for three individuals and the immediate supervisor did not sign the comprehensive examination for another individual.

This is a Severity Level V Violation (Supplement I.E). A similar item was brought to your attention following a recent inspection at North Anna (Report Nos. 50-338/81-07 and 50-339/81-07).

F. 10 CFR 50, Appendix B, Criterion V and the accepted QA Program, Section 17.2.5, require that activities affecting quality shall be prescribed by procedures. The Nuclear Power Station Quality Assurance Manual, (NPSQAM) Section 5, Instructions, Procedures and Drawings, Revision 19, dated September 1980, Paragraph 5.1, defines 18 different types of procedures that have been established to assure safe and orderly operation of the station. The accepted QA Program, Table 17.2.0, endorses ANSI N18.7-1972. Section 5.4 of this Standard requires periodic review of procedures and states that the frequency of these reviews shall be specified.

   Contrary to the above, 14 of 18 types of procedures identified in the NPSQAM are not periodically reviewed and the frequency of reviews is not specified. Examples of procedures not periodically reviewed are Quality Assurance and Periodic Test.

   This is a Severity Level V Violation (Supplement I.E).

G. 10 CFR 50, Appendix B, Criterion XIII and the accepted QA Program, Section 17.2.13 require that measures be established to control the storage and preservation of material to prevent deterioration. Control of items with a limited shelf life constitute a deterioration control measure.

   Contrary to the above, a program has not been developed to identify and control the receipt, storage and issuance of safety-related materials which have a limited shelf life.

   This is a Severity Level V Violation (Supplement I.E).

H. 10 CFR 50, Appendix B, Criterion XVIII and the accepted QA Program, Section 17.2.18 require that followup action, including reaudit of deficient areas, shall be taken where indicated. Additionally, the accepted QA Program,

Table 17.2.0 endorses ANSI N45.2.12 (Draft 3, Revision 4 - 1974). Section 4.5.2 of this Standard requires that followup action by the auditing organization shall be performed by the audit team leader or management of the auditing organization to confirm that corrective action is accomplished as scheduled.

Contrary to the above, for Audit S-80-13, Finding 1 was closed without the auditing organization confirming that corrective action was accomplished as scheduled.

This is a Severity Level V Violation (Supplement I.E).

I. 10 CFR 50, Appendix B, Criterion XVIII and the accepted QA Program, Section 17.2.18, require a system of audits shall be carried out to verify compliance with all aspects of the quality assurance program. The accepted QA Program also states that provisions are established requiring that audits be performed in those areas where the requirements of Appendix B to 10 CFR 50 are being implemented.

Contrary to the above, audits are not being conducted at the company offices in two areas, records and document control. Since a major portion of activities in each of these areas are being conducted and audited at the Surry site, a lower Severity Level has been assigned.

This is a Severity Level VI Violation (Supplement I.F).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty 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. Consideration may be given to extending your response time for good cause shown. 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: JAN 22 1981