VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

December 31, 1984

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No. 607A
NO/HLM/JDH/lms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT NOS. 1 AND 2
SUPPLEMENTAL RESPONSE TO IE INSPECTION
REPORT NOS. 50-280/84-24 AND 50-281/84-24

On November 2, 1984, we responded to the specific violations identified in IE Inspection Report Nos. 50-280/84-24 and 50-281/84-24. As a result of subsequent discussions with the NRC Surry Resident Inspector, we are supplementing our response to violation No. 2 to provide additional information regarding our corrective actions. The supplemental information is identified in the attachment by a change bar in the margin.

The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

W. L. Stewart

Attachment

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-24 and 50-281/84-24

VIOLATION

10 CFR 50.59 requires records of written safety evaluations which determine that an unreviewed safety question is not involved when the licensee makes changes in the facility as described in the safety analysis report (FSAR).

Contrary to the above requirement, as of August 31, 1984 a written safety evaluation of the facility change which removed the automatic trip valve isolation function on high flow from the RCP thermal barrier coolers and the primary drain coolers, as described in Section 9.4 of the Surry FSAR, was not provided and maintained.

This is a Severity Level IV Violation (Supplement I), and applies to both Units.

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

Prior to the initial operation of Units No. 1 and 2, (1972), the high flow trips for RCP thermal barrier coolers and primary drain coolers were defeated. Momentary pressure surges due to the starting of the Component Cooling Water (CCW) pumps caused the high flow trip valves to close on an excess flow signal. The high flow trips were removed when it was determined that their function would not enhance safety. The high flow trip valves were recognized to be inadequate to isolate the system on a thermal barrier failure because there were no installed upstream check valves. Evidence of a formal written safety evaluation for the defeating of the flow trip has not been located.

Subsequent to the defeating of the high flow trips, Stone and Webster Engineering Corporation, Vepco's principal A/E, proposed a long term solution in an October 11, 1972 letter. A design change request was initiated, but the proposed design change was never implemented.

Pursuant to 10 CFR 50.71 (e), the FSAR was initially updated in 1982 to reflect changes made to the facility since the issuance of the original FSAR in 1972. During this process, the description of the proposed modification, as described in the October 11, 1972 letter, was erroneously included in the updated FSAR (UFSAR).

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A formal written safety evaluation has been completed to support the defeating of the RCP thermal barrier cooler and primary drains tank cooler high flow trips. The evaluation concluded that an unreviewed safety question does not exist. Procedures controlling modifications including design changes and the updating of the UFSAR have already been strengthened. In addition, the annunciator response procedures have been strengthened to assure that clear guidance is provided to the operator in order to mitigate a thermal barrier failure.

The proposed long term solution, which consists of adding a high pressure check valve in the supply line and a high pressure high flow trip valve in the discharge for each Reactor CoolantPump thermal barrier, will be implemented. This modification will be completed during the 1986 refueling outages.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Changes and updates to the UFSAR are and will continue to be processed as plant modifications are accomplished in order to preclude such occurrences in the future.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.