

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry

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

The following violation was identified during an inspection conducted on April 8-12, 1985. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Appendix J to 10 CFR 50 contains the following requirements:

1. Paragraph III.A.1.(d) requires that for a Type A test, systems which become potential air leakage paths post accident will be drained and vented to the extent necessary to assure exposure of the system containment isolation valves to containment air test pressure at post accident differential pressure.
2. Paragraph III.A.1.(a) requires that if during a Type A test, potentially excessive leakage paths are identified which result in the Type A test not meeting the acceptance criteria of Paragraph III.A.5.(b), the Type A test shall be terminated and leakage through such paths measured using local test methods. Repairs and/or adjustments shall be made and a Type A test performed.
3. Paragraph III.A.3.(b) requires, in part, that a supplemental test shall be performed and the difference between the supplemental test data and the Type A test data shall be within 0.25 La. If the results are not within 0.25 La, the reasons shall be determined, corrective action taken, and a successful supplemental test performed.

Contrary to the above, in the period prior to and including September 10-14, 1983:

1. Containment penetration valve alignments to establish the Type A test boundary conditions were performed in accordance with Procedure PT-16.3 as required by Technical Specification 6.4. PT-16.3 does not contain adequate venting and draining instructions.

As a result, the requirements of Paragraph III.A.1.(d) of Appendix J to 10 CFR 50 were not met in that seven penetrations (Nos. 47, 56A, 56B, 56D, 89, 103, and 104), potential post accident air leakage paths, were not properly vented and drained.

2. Excessive leakage which prevented meeting the acceptance criteria of Paragraph III.A.5.(b) of Appendix J to 10 CFR 50 was identified subsequent to the start of the Type A test at 1300 hours, September 13, 1983. At 1800 hours, September 13, 1983, the excessive leakage was isolated (in lieu of repair) and the Type A test was continued until 0500 hours September 14, 1983, at which time the test was terminated.

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An NRC staff position has determined that isolation of a leakage path in lieu of repair and/or adjustments is within the intent of this regulation, provided that after the Type A test, the before and after repair leakage is determined using local leak rate testing methods and appropriate adjustment is made to the Type A test result.

As a result, the requirements of Paragraph III.A.1.(a) of Appendix J to 10 CFR 50 were not met in that the Type A test, started at 1300 hours, September 13, 1983, was not terminated and a separate Type A test started and performed subsequent to isolation of the excessive leakage path at 1800 hours, September 13, 1983. This resulted in license acceptance and reporting to the NRC, as required by Paragraphs III.A.1.(a) and V.B of Appendix J to 10 CFR 50, an incorrect containment leakage status. Acceptance of the incorrect containment leakage status further resulted in an unauthorized termination of the Type A test in less than 24 hours as required by Paragraph III.A.3.(a) of Appendix J to 10 CFR 50 which incorporates the test requirement of paragraph 7.6 of ANSI N45.4.

3. A supplemental (verification) test performed at 0500 hours, September 14, 1983, after the conclusion of the Type A test yielded a difference between calculated and metered change in containment air mass of 24.88 pounds during a 1.667 hour test. Misapplication of the full allowable error to the difference between the Type A test result and supplemental test results of 0.25 La, equivalent to 138 pounds per day, caused the licensee to accept the supplemental test. When reduced to rates in terms of pounds per hour, the difference between Type A and supplemental test results of 15 pounds per hour does not meet the error acceptance limit specified in Paragraph III.A.3.(b) of 5.75 pounds per hour.

As a result, the requirements of Paragraph III.A.3.(b) of Appendix J to 10 CFR 50 were not met and when the difference between the Type A test result and the supplemental test result did not meet the error acceptance limit, the reason was not determined, corrective action was not taken, and a successful supplemental test was not performed.

This is a Severity Level IV violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the reasons for the violation 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: MAY 30 1985