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VIRGINIA POWER

Dr. J. Nelson Grace
Regional Administrator
Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No. 85-168A
NO/HLM:dn
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Dr. Grace:

On April 1, 1985, we responded to the specific violations identified in IE Inspection Report Nos. 50-280/85-01 and 50-281/85-01. With this report, we are supplementing our response to violation 85-01-02 to provide information regarding additional corrective steps which have been taken. The supplemental information is identified in the attachment by a change bar in the margin.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power has no objection to this inspection report being made a matter of public disclosure. 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
W. L. Stewart

Attachment

cc: (w/attachment)

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

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

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/85-01 and 50-281/85-01

VIOLATION

- a. Technical Specification, Table 4.1-1, Item 35 requires monthly testing of the control room chlorine detectors.

Contrary to the above, the control room detectors were not tested between October 15, 1984, when the Technical Specification Amendment 100 was issued and January 30, 1985.

- b. Technical Specification, Table 4.1-2A, Item 20.6 requires a monthly channel functional test of the Unit 1 Containment Hydrogen Analyzers.

Contrary to the above, the Unit 1 Containment Hydrogen Analyzers were not tested between December 25, 1984, when Unit 1 was restarted, and February 13, 1985, at which time the testing was performed. The testing grace period expired on February 2, 1985.

These are two examples of a Severity Level IV Violation (Supplement I) and apply to Unit 1.

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

The violation resulted from a failure to follow station administrative procedures which specify responsibilities for implementing Technical Specification (TS) surveillance requirements and updating station procedures upon issuance of TS amendments.

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

A review of station records indicates that the chlorine detectors were operable during the period of missed surveillance and surveillance was performed on January 30, 1985. Station procedures have been updated to incorporate the TS surveillance requirements for control room chlorine detectors.

A review of station records indicates that the Unit 1 containment hydrogen analyzers were operable during the period of missed surveillance testing and were calibrated on February 15, 1985.

During a review of recent license amendments, the station also identified that the reactor vessel head vent upstream manual isolation valve was not "locked" in the open position as required by T.S. 4.1.B.5.a. The manual valve was open, although not locked or required to be locked by station procedures. The manual isolation valve has been locked open and station procedures have been modified to reflect this requirement on both units.

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

In the second quarter of 1984 a contractor for Virginia Power conducted a review to determine Surry Power Station (SPS) compliance with TS surveillance requirements. This review included surveillance requirements through Amendment Nos. 95 (Surry, Unit 1) and 94 (Surry, Unit 2) of the Surry TS. As a result of the station deviation on the control room chlorine detector, a similar review was initiated for amendments received subsequent to that time.

Station surveillance procedures are being updated to incorporate the TS requirements for the containment hydrogen analyzers.

In addition, a review of station administrative procedures identified areas where administrative controls could be strengthened. ADM-24, Adherence to Technical Specifications, ADM-51, Document Control, and ADM-60, Station Procedures, will be reviewed and revised where necessary to strengthen administrative controls for review of TS amendments and their implementation.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- a. Administrative procedures will be revised by June 30, 1985.
- b. Station procedures for surveillance requirements of the containment hydrogen analyzers have been revised.