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June 3, 1985



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. 85-363
NO/WRB:dn
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

We have reviewed your letter of May 3, 1985 in reference to the inspection conducted at Surry Power Station on March 5 - April 1, 1985 and reported in IE Inspection Report Nos. 50-280/85-09 and 50-281/85-09. Our response to the specific violation is attached.

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

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. 50-280/85-09 and 50-281/85-09

VIOLATION

Technical Specification 6.4.A.1, 6.4.A.7, and 6.4.D require that the detailed written procedures with appropriate check-off lists and instructions provided for all systems and components involving nuclear safety of the station, including maintenance or changes to these systems and components, shall be followed.

Contrary to the above requirements, design change and electrical maintenance procedures were not followed on March 25, 1985, in that several Unit 1 and Unit 2 electrical cable tray covers were observed to be loose and improperly positioned in the cable vault areas between the emergency switchgear room and the penetration areas following electrical maintenance design changes. In addition, on March 27, 1985, several cable tray covers in the Unit 2 containment were also observed to be loose or unattached; nearly half of the 32 cable tray structural supports on the vertical trays in the containment penetration area were also loose or unbolted.

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

The requirements in the installation specification regarding cable tray covers and supports were not followed. As stated in the finding a large number of design changes involving cable installations were in progress during the course of the inspection. Inspections made at the end of the work shift were incomplete in that some tray covers and clips and supports were not secured.

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

A review of existing procedures has determined that the proper procedures are in place to govern securing tray covers and supports, through the installation specifications and end of shift walkdowns. The importance of strict compliance with these procedures has been given new emphasis and construction and maintenance workers have been and are being periodically reminded to ensure that covers and supports are secured and returned to the proper condition.

In addition, the amount of work performed in the congested cable tray areas also increases the chance that non-electrical craft personnel might inadvertently disturb the cable tray cover clips. Craft personnel will be instructed in the importance of maintaining clips in place and will be instructed to advise the shift supervision of such an event, to allow proper correction.

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

Cognizant Supervisors and Foreman will continue to emphasize the importance of verifying reinstallation of cable tray covers to craft personnel.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Thorough reviews will be completed during the Unit 2 refueling outage to ensure tray covers and supports disturbed on both Unit 1 and Unit 2 during maintenance and modification work are properly secure, prior to start-up from the outage.