

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

85 SEP 18 12:00

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

September 12, 1985


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

Serial No. 85-492A
NO/HLM:dn
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

With our letter serial 85-492 of July 24, 1985, we provided our response to notice of violation reported in IE Inspection Report Nos. 50-280/85-19 and 50-281/85-19. We have expanded our program to prevent further violations. The purpose of this letter is to revise paragraphs three and four of the attachment of our letter serial 85-492 of July 24, 1985 to describe the additional actions.

Very truly yours,


W. L. Stewart

Attachment

8509260106 850912
PDR ADDCK 05000280
Q PDR

11 IEO1

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/85-19 and 50-281/85-19

VIOLATION

Appendix B to 10 CFR 50, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, appropriate procedures were not prescribed nor provided for the installation of the environmentally qualified (EQ) Conax electrical conductor (connector) seal assembly on to EQ, safety-related electrical components inside the Units 1 and 2 containments. For example, Design Change procedure DC-81-103 and Attachments, for replacing the Class IE transmitters and seal assemblies, did not provide appropriate instructions for centering the midlock ferrule on the feedthrough assembly and did not specify thread sealing materials or proper bracing for the installations.

In addition, certain installations were not accomplished in accordance with the DC-81-103 procedures and instructions. Seal assemblies were found over and under torqued and installed backwards, and two unqualified PL type seal assemblies were found installed inside containment.

As a result of the above, some 10 EQ, safety-related electrical components inside the Units 1 and 2 containments were determined to be unqualified, and at least 36 of the remaining 200 components inside the containments may not have provided adequate sealing during and following design basis events.

This is a Severity IV violation (Supplement II).

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

Equipment installation procedures were not adequately detailed to address the critical steps for proper seal assembly installation and were not updated when the vendor's installation manual was updated. Additionally, there was an inadequate review of the procedure which should have determined that special training was required for craft personnel performing the installation. Failure of construction craft to strictly follow procedures also contributed.

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

Open design changes requiring installation of conax connectors for which construction has not been completed have been reviewed in accordance with the latest revision of the vendor's manual available at the time to ensure that procedures, instructions and drawings are correct. In addition, a detailed inspection program was developed and conducted for both units 1 and 2 equipment inside containment and identified discrepancies were corrected.

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

Station repair and replacement procedures have been reviewed and modified accordingly.

As an additional measure to assure that similar problems in other areas will be avoided, craft training will be provided for design changes when new or "special applications" products are introduced for which construction crafts are unfamiliar, as well as for design changes that the construction Supervisor determines training is required. Also, it will be reemphasized to craft personnel the importance of strictly adhering to procedures.

Inspection personnel will attend the craft training described above to increase their knowledge of the "special application" procedures. A course in Quality Assurance Awareness is being implemented for non-QA supervisors at Surry Power Station to improve quality at the station.

We are continuing to improve our Tech Manual library by requesting vendors to supply us with their latest revisions to technical information for safety related equipment being used on site.

In addition, outside containment equipment that utilizes the type of seal assembly addressed in the violation has also been identified and an inspection program is currently underway. Any identified discrepancies will be corrected.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Design and station procedures have been modified; full compliance has been achieved.