

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

April 8, 1987

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Serial No.: 87-126  
NO/WDC:pms  
Docket No.: 50-281  
License No.: DPR-37

Gentlemen:

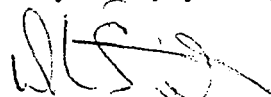
VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNIT 2  
NRC INSPECTION REPORT NO. 50-281/86-36

We have reviewed your letter of March 2, 1987, in reference to the inspection conducted at Surry Power Station on November 13-20, 1986 and February 9, 1987 and reported in Inspection Report No. 50-281/86-36. Based on our review, we have determined that we are in compliance with 10 CFR 50 Appendix J and our Technical Specifications. Our response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart

Attachment

cc: U. S. Nuclear Regulatory Commission  
101 Marietta St., N.W.  
Suite 2900  
Atlanta, Georgia 30323

Mr. W. E. Holland  
NRC Senior Resident Inspector  
Surry Power Station

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RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED ON NOVEMBER 13-20, 1986 AND FEBRUARY 7, 1987  
INSPECTION REPORT NO. 50-281/86-36

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on November 13-20, 1986 and February 9, 1987, a violation of NRC requirements was identified. The violation involved failure to properly establish conditions to perform the Type A ILRT. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

10 CFR 50 Appendix J, Paragraph II defines a Type A test as a test intended to measure the primary containment overall integrated leakage rate obtained by a summation of leakage through all potential leakage paths including valves, fittings, and components which penetrate containment.

Paragraph III.A.1.(d) requires that fluid systems that are part of the reactor coolant pressure boundary and are open directly to the containment atmosphere under post-accident conditions shall be opened or vented to the containment atmosphere prior to and during the Type A test. All vented systems must be drained of water to the extent necessary to assure exposure of the containment isolation valve to containment air test pressure and to assure they will be subjected to the post-accident differential pressure. Systems that are normally filled with water and operating under post-accident conditions are not required to be vented; however, their containment isolation valves must be Type C tested.

Paragraph III.C requires that containment isolation valves be Type C tested to measure their leakage rate by pressurizing with air or nitrogen unless the valve is pressurized with fluid from a seal system.

Technical Specification, Table 3.8-2, lists the containment isolation valves and specifies which ones are exempt from Type C testing. Such exemption signifies that the valves have received credit for a water seal and are not considered a credible leakage path for the containment atmosphere. Table 3.8-2 includes the isolation valves for Penetrations No. 46, 63, 64, and 66 through 71 and does not exempt them from Type C testing.

Contrary to the above the licensee failed to either properly vent and drain Penetrations No. 46, 63, 64, and 66 through 71 during the performance of the November 1986, Type A test on Unit 2, or to determine the overall integrated leakage rate by the summation of the leakages obtained during the Type C testing of such penetrations to the results obtained during the CILRT.

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

RESPONSE:

1. Admission or denial of the alleged violation:

The alleged violation as stated is not correct. The notice of violation indicates that any penetration listed in Table 3.8-2 of the Technical Specifications subject to Type C testing must also be vented and drained during the Type A test. Such a requirement is not found in either 10 CFR 50 Appendix J or the Technical Specifications. Paragraph III.A.1.(d) of Appendix J states that systems normally filled with water and operating under post-accident conditions need not be vented; however their containment isolation valves must be Type C tested. The containment testing of Unit 2 was in compliance with this requirement.

The penetrations specified in the notice of violation (46, 63, 64, 66, 67, 68, 69, 70, and 71) would be normally filled with water and operating under post-accident conditions. Accordingly, Type C tests were performed prior to the ILRT on each of the corresponding containment isolation valves, and the penetrations were not vented for the Type A test, in accordance with the approved test procedure. A complete list of containment penetrations, their status during the ILRT, and an explanation of their status was included in Attachment 7.7 of the "Reactor Containment Building Integrated Leakage Rate Test" Report for Unit 2, submitted on March 30, 1987.

In response to the NRC Inspector's concern with the status of the above penetrations during the Type A test, the final test report also included a review of the test results with the Type C leakages from these penetrations added to the Type A results. As noted in Attachment 7.8 of the report, the penalty from these Type C leakages was 0.0013 wt percent per day. This would raise the overall calculated Type A leakage to .065 wt percent per day, well within the allowable limit of .075 wt percent per day.

Since the tests were conducted in accordance with the explicit requirements of the Technical Specifications and Appendix J, the ILRT is considered to be acceptable, and no corrective action is deemed necessary.

2. Reason for the violation:

Not applicable.

3. The corrective steps that have been taken and the results achieved:

Not applicable.

4. The corrective steps that will be taken to avoid further violations:

Not applicable.

5. The date when full compliance will be achieved:

Not applicable.