

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company  
Surry

Docket Nos. 50-280, 50-281  
License Nos. DPR-32, DPR-37

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 23-27, 1987, and April 6-10, 1987, a violation of NRC requirements was identified. The violation involved failure of licensee maintenance personnel to follow procedures. 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 B, Criterion V and the licensee's accepted Quality Assurance Program (Virginia Electric and Power Company Topical Report VEP-1-5A) Section 17.2.5 collectively require that activities affecting quality shall be prescribed by procedures and accomplished in accordance with these procedures.

- (1) Mechanical Maintenance Procedure MMP-C-G-201, Corrective Maintenance Procedure for Flanged Joints in General dated February 3, 1986, paragraph 5.4 contains instructions for flange alignment and paragraph 5.5 contains instructions for torquing.

Contrary to the above, Work Order Number 33856, Mark Number 01-SI-FE-1940, was classified as "work performed by experienced maintenance technician and is considered minor maintenance" and was not performed in accordance with the referenced procedure. This resulted in a failure to incorporate in the maintenance activities all requirements for flange alignment and torque verification for flange fasteners. Additionally, the maintenance personnel replaced the flange fasteners without specific authorization of the work order.

- (2) Corrective Maintenance Procedure MMP-C-G-001, Corrective Maintenance for Valves in General dated September 26, 1985, paragraph 5.5.1.8 states "... remove old packing inspect and repack".

Contrary to the above, while performing Work Order Number 38498, Mark Number 01-SI-HCV-1852B maintenance personnel failed to remove the old packing and repack the valve.

- (3) Mechanical Preventive Maintenance Procedure, CH-MOV-M/R, Mechanical Preventive Maintenance Procedures for Motor Control Centers dated February 28, 1985, Paragraph 5.11 states "check for valve packing leakage. Adjust packing if necessary" and Paragraph 7.2 of the acceptance criteria states "Abnormal conditions noted, equipment operationally acceptable, work request submitted."

Contrary to the above, while performing Work Order Number 38401, Mark Number 02-CH-MOV-2373, maintenance personnel failed to adjust the packing of the subject valve after documenting a packing leak, and paragraph 7.2 was initialed indicating that this paragraph was not applicable, when in fact, there was an abnormal condition noted.

- (4) Electrical Maintenance Procedure, EMP-C-MCC-152, Corrective Maintenance Procedure for Replacement of Thermal Overload Devices In Safety-Related Motor Control Centers, dated May 8, 1986, Paragraph 6.3 states, "Current values should not exceed 15 percent of full load amperage" and Paragraph 7.3 of the acceptance criteria states. . . "Equipment operated satisfactory as determined in Steps 6.3 and 6.4."

Contrary to the above, while performing Work Order Number 45674, Mark Number 02-CS-MOV-200A, the opening torque values recorded in paragraph 6.3 were 33 percent above the full load amperage value and paragraph 7.3 was initialed, indicating that the results were satisfactory, when in fact, corrective actions were not taken.

- (5) Electrical Maintenance Procedure, EMP-C-MCC-152, Corrective Maintenance Procedure for Replacement of Thermal Overload Devices in Safety-Related Motor Control Centers, dated May 8, 1986, paragraph 3.7 requires "Record manufacturer and part number, stock number, or Purchase Order number on the Work Order, in the Machinery History Section, and below."

Contrary to the above, maintenance personnel failed to record the data on the thermal overload heaters as required during performance of Work Order 45674 on Mark Number 02-CS-MOV-200A.

- (6) Corrective Maintenance Procedure, MMP-C-G-001, Corrective Maintenance Procedure for Valves in General, dated September 26, 1985, Paragraph 5.5.2 states, "Record instrument and SQC numbers and torque values on the Maintenance Inspection Report" (Attachment 6 to this procedure).

Contrary to the above, while performing Work Order Number 38498 Mark Number 01-SI-HCV-1852B appropriate values were not recorded on the Maintenance Inspection Report.

- (7) Mechanical Maintenance Procedure MMP-C-G-001, Corrective Maintenance Procedure for Valves in General, dated September 26, 1985, Paragraph 5.5.2 states, "Record instrument and SQC numbers and torque values on the Maintenance Inspection Report" (Attachment 6 to this procedure).

Contrary to the above while performing Work Order Number 39354, Mark Number 01-CH-FCV-1160, appropriate values were not recorded on the Maintenance Inspection Report.

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- (8) Mechanical Maintenance Procedure MMP-C-RC-009.1, Corrective Maintenance Procedure for Reactor Coolant Pump Seals dated June 18, 1985, Paragraph 4.6 states "Inspection of Safety Related components for trouble shooting, etc. must have as found, as left data (readings, etc.) documented on a procedure addendum sheet or Maintenance Inspection Report."

Contrary to the above, while performing Work Order Number 35553, Mark Number 01-RC-P-1B appropriate values were not recorded on the Maintenance Inspection Report

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

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

*Caudle A. Julian*

Caudle A. Julian, Chief  
Operations Branch  
Division of Reactor Safety

Dated at Atlanta, Georgia  
this 18th day of June 1987