

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 17, 1987

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

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

Serial No. 87-391
 NO/GDM: caa
 Docket Nos. 50-280
 50-281
 License Nos. DPR-32
 DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NRC INSPECTION REPORT NOS. 50-280/87-06 AND 50-281/87-06

We have reviewed your letter of June 18, 1987, in reference to the inspection conducted at Surry Power Station on March 23-27 and April 6-10, 1987 and reported in Inspection Report Nos. 50-280/87-06 and 50-281/87-06. Our response to the Notice of Violation is addressed in the attachment.

In addition to the specific actions taken within the Maintenance Department in response to this violation, the Quality Assurance Department has determined that enhancements to the review process for completed work order packages are warranted. These enhancements include specific guidance for package review, including assignment of reviews by maintenance disciplines. These improvements are scheduled for full implementation by October 1, 1987.

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 for

W. L. Stewart

Attachment

cc: U.S. Nuclear Regulatory Commission
 Region II
 101 Marietta Street, N.W.
 Suite 2900
 Atlanta, GA 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 MARCH 23-27 AND APRIL 6-10, 1987
INSPECTION REPORT NOS. 50-280/87-06 AND 50-281/87-06

NRC COMMENT:

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.

- (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).

RESPONSE:

1. **ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:**

The violation is correct as stated with the exception of Example 2. Valve 1-SI-HCV-1852B had an internal leakage concern which was repaired under Work Order 38498 by lapping the seat. The packing was determined to be acceptable, and thus the valve did not require repacking. Step 5.5.1.8 was signed off as not applicable (NA) in accordance with the procedure (MMP-C-G-001) step 5.5, which permits non-applicable steps to be marked not applicable, initialed and dated. Therefore, the repair of 1-SI-HCV-1852B was accomplished in accordance with the procedure and should not be included in the violation.

2. **REASON FOR THE VIOLATION:**

Maintenance personnel did not specifically follow every procedural requirement for the work performed.

3. **THE CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:**

Each example cited in the violation was reviewed, and the documentation discrepancies were corrected as appropriate. In the case of example 1, satisfactory performance of the maintenance was subsequently verified by determining that the flange did not leak following repairs, and by verification of the stud torque values in accordance with procedure MMP-C-G-201. In the case of Example 4, engineering review and discussions with Limitorque have determined that motor currents of 125% or less of the name plate values do not represent a degraded condition; procedure EMP-C-MCC-152 is being revised to reflect the corrected criterion. The initial testing of 2-CS-MOV-200A was evaluated and the valve was retested satisfactorily using the revised acceptance criterion. For examples 5 through 8, the missing data were found elsewhere in the work package, and have been transferred to the appropriate locations in the procedures. In the case of Example 3, the work summary identified packing leakage, since "yes" was checked. However, subsequent review determined that no leakage was in fact observed, and that the "yes" blank was apparently checked in error.

Meetings were held with maintenance personnel by the Vice President Nuclear Operations, Station Manager, and Superintendent of Maintenance to discuss this violation and the importance of procedural adherence and proper documentation. Additional meetings were held with crew foremen to ensure that a final document review is performed following completion of work.

Teams were formed to review completed work packages and maintenance procedures performed in 1987. Documentation discrepancies were noted, when found, and discussed with the foremen.

Significant improvements in maintenance documentation have been noted since implementation of these initiatives.

4. THE CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

The increased sensitivity on the part of maintenance personnel and supervision to procedural and documentation issues should mitigate further violations of this type.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.