

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

October 6, 1987

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

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

Serial No. 87-629  
NO/JDH:vlh :R2  
Docket No. 50-280  
License No. DPR-32

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNIT 1  
REQUEST FOR DISCRETIONARY ENFORCEMENT

Virginia Electric and Power Company requests that NRC Region II exercise discretionary enforcement regarding Surry Unit 1 compliance with Technical Specification 4.7, Main Steam Line Trip Valves. The basis for our request is discussed below.

On October 2, 1987, while at full power, maintenance personnel were confirming torque measurements on the Surry Unit 1 "C" Main Steam Trip Valve (MSTV) body-to-bonnet studs. During that evolution, two of the twenty-four studs were identified to be in a degraded condition, including one broken stud.

An evaluation was immediately conducted regarding the operability and safety of the MSTV. Although the evaluation concluded that valve integrity was assured provided twenty-two of the twenty-four studs were intact, station management decided to shutdown the unit to perform additional evaluations and investigation of the degraded studs. Non-destructive examinations were performed on the "C" MSTV, as well as the "A" and "B" MSTVs. Two additional degraded studs were identified on the "C" MSTV; no degraded studs were identified in the other two valves. All studs on the "C" MSTV were replaced. Metallurgical evaluations of the degraded studs are in progress.

In preparation for restart we have performed the required surveillance test on the MSTVs in the cold shutdown condition. The results were similar to those provided to you in our October 2, 1987 (Serial No. 87-616) letter. Although the most recent times were a slight improvement, ranging from 4.89 to 6.41 seconds (compared to the previous results of 5.37 to 7.22 seconds), and demonstrate that there is degradation in valve closure times, two of the MSTVs are still not capable of meeting the acceptance criterion of five seconds or less specified in the current Surry Technical Specifications.

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Based on our current schedule for Unit 1, we plan to leave cold shutdown today, achieve criticality tomorrow morning (October 7, 1987) and be on-line tomorrow evening. Even if the test were to be repeated in the hot shutdown condition with steam flow, we do not expect sufficient improvement in valve response, based on previous experience, to be able to satisfy the current acceptance criteria.

Accordingly, we request that NRC exercise discretionary enforcement to permit restart of Surry 1 on or about October 7, 1987. We understand that this is a one-time only approval. As committed to during a conference call on October 6, 1987 with NRC management, we will submit a proposed Technical Specification change regarding the MSTVs by October 7, 1987. Included in that proposed change will be sufficient justification for NRR to process the proposed change on an emergency basis should another MSTV surveillance test be required prior to NRC approval of the proposed change.

In the interim, we have evaluated the ability of the MSTVs to perform their safety function in the event of a main steamline break event and conclude that, based on the closure times documented in the most recent surveillance test, the offsite dose consequences remain a small fraction of the 10 CFR Part 100 guidelines and the conclusions of the current accident analyses remain valid.

Very truly yours,



W. L. Stewart

Attachments

cc: U. S. Nuclear Regulatory Commission  
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Mr. W. E. Holland  
NRC Senior Resident Inspector  
Surry Power Station