# VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

November 25, 1987

W. L. STEWART VICE PRESIDENT NUCLEAR OPERATIONS

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

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Docket Nos.	50-280
	50-281
License Nos.	DPR-32
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Gentlemen:

# VIRGINIA ELECTRIC AND POWER COMPANY SURRY POWER STATION UNITS 1 AND 2 NRC INSPECTION REPORT NOS. 50-280/87-30 AND 50/281/87/30

We have reviewed your letter of October 28, 1987, in reference to the inspection conducted at Surry Power Station on September 28 - October 2, 1987 and reported in Inspection Report Nos. 50-280/87-30 and 50-281/87-30. Our response to the two violations described in 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,

Lohondwick der 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

> > PDR





### RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT NOS. 50-280/87-30 AND 50-281/87-30

#### NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on September 28 - October 2, 1987, violation of NRC requirements were identified. The violations involved the licensee failure to perform or ask relief from performing valve inservice tests required by the ASME code and the use of superseded test procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are (is) listed below:

10 CFR 50.55a(g)(4)(ii) requires the performance of inservice tests to verify operational readiness of pumps and valves, whose function is required for safety, in accordance with the American Society of Mechanical Engineers Boiler and Pressure Vessel (ASME B&PV) Code Section XI. ASME B&PV Code, Section XI, 1980 Edition Winter 1980 Addenda (80W80), has been identified as the applicable code for inservice testing of pumps and valves. ASME B&PV Code, Section XI, 80W80 paragraph IWV-3411, states in part:

"If only limited operation is practical during plant operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns."

Contrary to the above, inservice tests are not performed as required by ASME B&PV Code Section XI to verify operational readiness of pumps and valves, whose function is required for safety, in that approximately 56 valves which are only full-stroke exercise tested at cold shutdown or refueling shutdown outages have not been part-stroke exercise tested during plant operation. In addition relief from the part-stroke exercise testing has not been requested for these valves.

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

RESPONSE

### 1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is not correct as stated.

We believe that the sentence from the ASME B&PV Code which we are cited against has been taken out of context. As pointed out in paragraph 5.h.(1) of the Inspection Report, ASME B&PV Code, Section XI, 80W80, Paragraph IWV-3411 provides the test frequency and Paragraph IWV-3412 provides the exercising procedure for Category A and B valves.

Subparagraph IWV-3412(a) states:

"Valves shall be exercised to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during plant operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns. <u>Valves that cannot be exercised during</u> <u>plant operation shall be specifically identified by the Owner and shall be full-stroke exercised during cold shutdowns</u>. Full-stroke exercising during cold shutdowns for all valves not full-stroke exercised during plant operation shall be on a frequency determined by the intervals between shutdowns as follows: for intervals of 3 months or longer, exercise during each shutdown; for intervals of less than 3 months, full-stroke exercise is not required unless 3 months have passed since last shutdown exercise."

We agree that whenever practical during plant operations valves should be exercised, full-stroke or partial-stroke. However, we also believe that the Code allows deferral of this exercising when it is impractical during plant operations as long as these valves have been specifically identified. The 56 valves referenced in the Notice of Violation have been identified in Relief Requests submitted to the NRC with the Inservice Testing Program or subsequent submittals. Each Relief Request provides our justification for not exercising the valves during plant operations and provides and alternate test frequency (e.g., every cold shutdown or refueling shutdown as applicable.)

We use the Relief Request as our method of documenting those valves which we believe are impractical to exercise, full-stroke or partial-stroke, during plant operations. However, as noted in your inspection report paragraph 5.h.(1), the Station Administrative Procedure SUADM-M-21, "Valve Program", requires: "exercising during plant operation unless such operation is not practical during plant operations, [[if only limited operation is practical during plant operations]] the valve should be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns." The phrase in brackets above was inadvertently omitted from the procedure.



This omission resulted from a typographical error during procedure preparation. This error caused our procedure to inaccurately reflect the Code requirement. Therefore we inadverently imposed the requirement to exercise (full-stroke or partial-stroke) quarterly during plant operation which is more conservative than the Code requirements. We feel we have fully satisfied the intent of the ASME B&PV Code Section XI, Paragraph IWV-3411 and have failed to accurately reflect the Code requirements in our Valve Program Administrative Procedure, SUADM-M-21, which has only minor safety significance.

2. REASONS FOR VIOLATION

Surry Administrative Procedure SUADM-M-21, "Valve Program," did not accurately reflect the Code requirements, however, no Code requirements were violated.

#### 3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

None.

# 4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The Surry Administrative Procedure, SUADM-M-21, will be revised to accurately reflect the requirements of the ASME B&PV Code, Section XI, 1980 Edition, Winter 1980 Addenda. Any ambiguity between the Code requirements and our program will be resolved.

# 5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Surry Administrative Procedure, SUADM-M-21, will be revised by December 31, 1987.

### NRC COMMENT

10 CFR 50 Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with procedures. Procedures No. SUADM-ADM-18 of July 17, 1987, "Document Control" paragraph 5.1.1(1)(b) states in part" "...New and revised procedures will be implemented not later than seven days after approval by the Station Nuclear Safety and Operating Committee." (SNS&OC).

Contrary to the above, procedures were not followed in that two inservice valve test procedures (1-PT-25.1, "Quarterly Testing of CW and SW System Valves" and 2-PT-18.6A, Quarterly Testing of Safety Injection MOVs and HCVs) were performed using superseded procedure revisions 22 and 16 days, respectively, after the seven day grace period following the approval of the new procedure revisions by the SNS&OC.

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

# **RESPONSE**

1. Admission or Denial of the Alleged Violation:

The violation is correct as stated.

2. <u>Reasons for Violation</u>:

The violation resulted from human error. Records Management personnel failed to remove and destroy outdated procedure revisions in the Operations Department's procedure depository once new revisions were filed. This is contrary to station administrative procedure requirements.

#### 3. Corrective Steps Which Have Been Taken and the Results Achieved:

Records Management personnel have been reinstructed on the importance of following procedures and of removing and destroying outdated procedures once new revisions are issued.

#### <u>Corrective Steps Which Will Be Taken to Avoid Further Violations:</u>

Presently, Records Management personnel perform an annual audit of the station's procedure depositories to verify the procedures are current and being properly maintained. To provide additional assurance of procedure maintenance, the station administrative procedure which addresses controlled procedure inventories will be revised to provide for additional verification of proper filing of procedure revisions.

5. Date When Full Compliance Will Be Achieved:

Full compliance has been achieved. The station administrative procedure will be revised by 2/28/88.