

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry Power Station Units 1 and 2

Docket Nos. 50-280, 50-281
License Nos. DPR-32, DPR-37
EA 87-181

During the Nuclear Regulatory Commission (NRC) inspection conducted between the period of July 5 to August 29, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Technical Specification 6.1.C.1.f requires that the Station Nuclear Safety and Operating Committee (SNSOC) shall be responsible for review of all proposed tests, changes, or modifications to plant systems or equipment that affect nuclear safety. Technical Specification 6.1.C.1.g requires that the SNSOC shall render determinations in writing with regard to whether or not the above items constitute an unreviewed safety question. 10 CFR 50.59 requires that the licensee maintain records of changes in the facility as described in the safety analysis report and maintain records of tests conducted at the facility not described in the safety analysis report to the extent that a written safety evaluation provides the bases for the determination that the change or test does not involve an unreviewed safety question. 10 CFR 50.59 (b)(2) also requires that the licensee shall submit a report containing a brief description of any changes or tests, including a summary of the safety evaluation of each.
1. Contrary to the above, in the instances cited below, required evaluations were not conducted to determine if an unreviewed safety question existed:
- A licensee deviation report dated June 19, 1987, identified a deletion of testing of the turbine inlet valves as required by FSAR, section 14.2.13. Review of the deviation determined that the issue had not been reviewed for unreviewed safety question determination when the decision was made to deviate from the FSAR requirement.
 - The FSAR, paragraph 8.4.1, states that the 4160V breaker which is used to connect redundant emergency busses is removed from the cubicle and is not installed when the unit is operating. During a system walkdown of the vital and emergency electrical system in June 1987, the subject breaker, which is the crossconnect breaker for the H and J bus, was racked out; however, the breakers for both units were in their cubicles.
 - On July 4, 1987, the manual isolation valve for the chemical addition system to the B steam generator (2-WT-177) was furmanited to repair a leaking condition. This repair left the valve inoperable and open. No evaluation for the unreviewed safety question determination was performed until the issue was identified by the NRC inspector.

- A temporary alteration which installed cooling ring headers on top of the containment for each unit did not receive evaluation for unreviewed safety question determination until after the issue was identified by the NRC inspector during his inspection.
 - A temporary plant modification was made in the form of an electrical jumper installed on July 27, 1987, around a radiation monitor (RM-GW-01-1) to permit the reestablishment of the containment vacuum flow path without an evaluation for unreviewed safety question determination.
2. Contrary to the above, the licensee did not submit a report of special tests (1-ST-186 and 2-ST-186, Bolt Identification Test) performed in February 1986, until the deficiency was identified by the NRC inspector.

This is a Severity Level IV Violation (Supplement I), and applies to both units.

- B. Technical Specification 6.4 requires that detailed written procedures with appropriate check-off lists and instructions shall be provided and followed for the testing of instruments, components, and systems involving nuclear safety of the station.

Contrary to the above, in the instances cited below, appropriate instructions were not provided and/or followed during the performance of the safety injection undervoltage functional tests, 1 and 2 PT-18.2 A and B, for the 1986 refueling outages.

- Testing to demonstrate that the loss of voltage protection is defeated and subsequently reinstated whenever the emergency diesel generator is the sole source of power to an emergency bus as required by Technical Specification 4.6.A.1.b was not adequately included in a licensee procedure.
- The acceptance criteria for test procedure 1-PT-18.2A was deleted with no reason given, and verification that the emergency diesel generator was secured and restored was not performed. The review of the completed test procedure package by the surveillance and test engineering group was not performed as required by Station Administrative Procedure SUADM-0-23.
- The use of a special test 1-ST-189 to satisfy discrepant test results was inadequate in that it did not receive the review and approval required for the original test, 1-PT-18.2A.
- Test results of 1-PT-18.2B, completed on July 6, 1986, were unsatisfactory and no corrective action was performed. The unsatisfactory results of this test were later determined to be due to a procedural

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problem; however, no procedure change request form, as required by Station Administrative Procedure SUADM-0-21, could be located. In addition, acceptance criteria for this particular test were deleted with no reason for the deviation given as required by SUADM-0-21.

This is a Severity Level IV Violation (Supplement I), and applies to both units.

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Surry Power Station, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY
M. L. ERNST

J. Nelson Grace
Regional Administrator

Dated at Atlanta, Georgia
this 29 day of December 1987