

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

January 28, 1988

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

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

Serial No. 88-010  
NO/GDM:pms R1  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

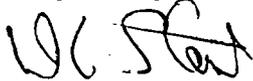
VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNITS 1 AND 2  
NRC INSPECTION REPORT NOS. 50-280/87-21 AND 50/281/87-21

We have reviewed your letter of December 29, 1987 in reference to the inspection conducted at Surry Power Station on July 5 to August 29, 1987 and reported in Inspection Report Nos. 50-280/87-21 and 50-281/87-21. Our response to 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,



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

8802020366 880128  
PDR ADOCK 05000280  
Q PDR

TEO1  
111

RESPONSE TO NOTICE OF VIOLATION  
ITEMS REPORTED DURING NRC INSPECTION CONDUCTED JULY 5 TO AUGUST 29, 1987  
INSPECTION REPORT NO. 50-280/87-21 AND 50/281/87-21

NRC COMMENT:

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.
    - 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 of 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 checkoff 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.1b 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 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.

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/87-21 AND 50-281/87-21

Item A

1. Admission or Denial of the Alleged Violation:

The violation is correct as stated.

2. Reason for the Violation:

Failure to perform 10CFR 50.59 evaluations for the first four examples tested resulted from inadequate understanding of the specific requirements of the regulation, particularly with regard to statements in the FSAR.

The fifth example resulted from a failure to recognize that the maintenance procedure being used for the radiation monitor, unlike the monitor's calibration procedure, did not specifically provide for the installation of the electrical jumper.

The omissions of certain Special Tests from the monthly reports to the NRC resulted from administrative errors in the reporting process.

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

A detailed Administrative Procedure has been developed and implemented to provide guidance in screening potential changes and performing the required safety evaluations. Training in the requirements of 10CFR 50.59 and the new procedure was provided to employees and supervisors responsible for performing these evaluations, as well as the members of the Station Nuclear Safety and Operating Committee.

Additional corrective actions taken with regard to the specific examples cited include the following items:

- The turbine inlet valve testing was performed on both units during the fall 1987 maintenance outages. Periodic test procedures were revised to require monthly valve testing when the units are operating, and the tests have been successfully performed.
- A 10CFR 50.59 evaluation was performed and a UFSAR change was initiated to describe the location of the 4160V breaker.
- The applicable monthly operating reports were corrected to include the omitted special tests.

4. Corrective Steps That Will Be Taken to Avoid Further Violations:

The UFSAR will be revised at the next scheduled update to properly reflect the location of the 4160V breaker.

The maintenance procedure used to reset the radiation monitors and to open the containment vacuum flowpath valves will be revised to allow installation of a jumper around the radiation monitor, as necessary.

Although current administrative procedures address reporting of changes requiring a 10CFR 50.59 review, further clarifications will be made to ensure timely reporting in the future.

5. The Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.

Item B

1. Admission or Denial of the Alleged Violation:

The violation is correct as stated.

2. Reason for the Violation:

The failure to perform the emergency diesel generator degraded/undervoltage testing required by Technical Specification 4.6.A.1.b was due to an inadequate review of the surveillance requirements imposed by Technical Specification Amendments 80/81 issued in October, 1982. In addition, a study performed on surveillance requirements in October, 1984, which had identified this discrepancy, did not receive adequate review, and the procedures were not corrected.

The remaining examples cited in the violation were the result of personnel errors either in implementing or processing procedures or procedure changes/deviations.

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

A detailed Administrative procedure for review of changes to the Technical Specifications was implemented in mid 1985. The program has been successfully used to review and track subsequent changes and to ensure that the necessary procedures are revised to reflect the Technical Specification change requirements.

Other specific corrective actions which have been completed to resolve the items cited in the violation include:

- Special tests were developed and satisfactorily performed in September, 1987 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 the emergency bus.
- The administrative procedure which controls tests has been revised. The procedure now requires the review of special tests by Surveillance and Test Engineering both before and after completion, as well as the previously required pre-and post-approval by the SNSOC. This exceeds the review and approval required for periodic tests.
- A procedure change request was initiated to revise the procedural problems identified in 1-PT-18.2B.

4. Corrective Actions Which Will Be Taken to Avoid Further Violations:

The refueling periodic tests 1/2-PT-18.2A,B will be revised to accurately reflect the surveillance requirements of Technical Specification Amendments 80/81.

In addition, a detailed review of Consequence Limiting Safeguards (CLS) and Safety Injection (SI) test procedures is being completed to ensure similar problems do not exist. A re-review of the discrepancies identified in the surveillance requirement study completed in October, 1984 is being performed.

5. The Date When Full Compliance Will Be Achieved:

The above procedure reviews and revisions will be completed by March 31, 1988, prior to the next scheduled refueling outage.