10CFR50.73

November 25,1997

Virginia Electric and Power Company
Surry Power Station
5570 Hog Island Road
Surry, Virginia 23883

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

Serial No.: 97-689
SPS:BAG
Docket No.: 50-280
50-281
License No.: DPR-32
DPR-37

Dear Sirs:

Pursuant to Surry Power Station Technical Specifications, Virginia Electric and Power Company hereby submits the following Licensee Event Report applicable to Surry Power Station Units 1 and 2.

REPORT NUMBER

50-280, 50-281/97-010-00

This report has been reviewed by the Station Nuclear Safety and Operating Committee and will be forwarded to the Management Safety Review Committee for its review.

Very truly yours,

D. A. Christian
Station Manager

Enclosure

Commitments contained in this letter: None

9712020172 971125
PDR ADOCK 05000280
S PDR

copy: U. S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, Georgia 30303

Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

NRC FORM 366 (4-95)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 4/30/98

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
SURRY POWER STATION , Unit 1	05000 - 280	1 OF 5

TITLE (4)

Missed Fire Protection Surveillance Due to Personnel Error

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCUMENT NUMBER
10	28	97	97	-- 010 --	00	11	25	97	Surry Unit 2	05000-281
									FACILITY NAME	DOCUMENT NUMBER 05000-

OPERATING MODE (9)	n
POWER LEVEL (10)	100 %

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.2201(b)		20.2203(a)(2)(v)	x	50.73(a)(2)(i)		50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
	20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		or in NRC Form 366A

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
D. A. Christian, Station Manager	(757) 365-2000

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	N	NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

At 2145 hours on October 28, 1997, with Unit 1 at 100% power and Unit 2 in Intermediate Shutdown following refueling, it was discovered that the 31 day surveillance periodic test (PT) used to determine the diesel driven fire pump 1-FP-P-2 operable was not completed within the time required by technical specifications. The cause for this event was cognitive personnel error. Fire pump 1-FP-P-2 was declared inoperable, and since recirculation valve 1-FP-36 was open, the motor driven fire pump 1-FP-P-1 was also declared inoperable. A 24 hour clock was entered to close valve 1-FP-36 and a 7 day clock was entered to test the diesel driven fire pump. Valve 1-FP-36 was closed and the motor driven fire pump was declared operable. Procedure 0-OPT-FP-009 was satisfactorily completed and fire pump 1-FP-P-2 was declared operable at 2334 hours on October 28, 1997. The individual involved was disciplined. As an enhancement, an additional administrative barrier has been implemented that compares the completed PT procedures with the PT work schedule.

No conditions adverse to safety resulted from this event and the health and safety of the public were not affected. This event is being reported pursuant to 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's technical specifications.

1.0 DESCRIPTION OF THE EVENT

On October 9, 1997, Unit 1 was at 100% power and Unit 2 was at cold shutdown for a scheduled refueling outage. The Unit 1 nightshift periodic test (PT) work schedule required that both 0-OSP-FP-009, Daily Fire Door Inspection, and 0-OPT-FP-009, Diesel Driven Fire Protection Water Pump [EIIS-KP,P] 1-FP-P-2, be completed during the shift. Using surveillance procedure 0-OSP-FP-009, the fire door inspection was completed during the shift and the daily PT work schedule initialed by the Unit 1 Reactor Operator (RO). The Unit 1 Senior Reactor Operator (SRO) reviewed the PT work schedule at the end of the shift and noted that the PT procedure 0-OPT-FP-009 was not initialed. He knew that the fire door inspection procedure had been performed and, mistaking 0-OPT-FP-009 for the fire door surveillance procedure, incorrectly initialed the PT work schedule.

The Operations department was notified by Station Engineering when PT procedure 0-OPT-FP-009 was not received for final review and processing.

On October 28, 1997, at 2145 hours, with Unit 1 at 100% power and Unit 2 in Intermediate Shutdown following refueling, it was determined that PT procedure 0-OPT-FP-009 had not been completed within the Technical Specification (TS) required frequency. TS 4.18.B.1.b and 4.18.B.2.a.2 requires that each fire water pump be started and operated for at least 15 minutes on recirculation flow; that the fuel storage tank [EIIS-KP,TK] is verified to contain at least 200 gallons of fuel; and that the diesel driven fire pump starts from ambient conditions and operates for at least 30 minutes on recirculation flow at least once within each 31 day period.

The diesel driven fire pump 1-FP-P-2 was declared inoperable because of the missed surveillance. During this event, the backup motor driven fire pump [EIIS-KP,P] 1-FP-P-1 was being used to clean Unit 2 water box. Since recirculation valve [EIIS-KP,V] 1-FP-36 for pump 1-FP-P-1 was open for the water box cleaning, the motor driven fire pump was also declared inoperable. A 24 hour clock was entered to close the recirculation valve and a 7 day clock was entered to test the diesel fire pump.

Valve 1-FP-36 was closed and the 24 hour clock was exited. Procedure 0-OPT-FP-009 was completed satisfactorily at 2334 hours, on October 28, 1997. The fire pump 1-FP-P-2 was declared operable and the 7 day clock was exited. This report is being made pursuant to 10 CFR 50.73(a)(2)(i)(B), violation of TSs 4.18.B.1.b and 4.18.B.2.a.2.

2.0 SAFETY CONSEQUENCES AND IMPLICATIONS

Periodic test procedure 0-OPT-FP-009 was previously completed satisfactorily on September 11, 1997. The last acceptable date for the completion of the next PT procedure, including

the allowable grace period, was October 19, 1997. The PT procedure 0-OPT-FP-009 was again performed satisfactorily on October 28, 1997, 9 days beyond the thirty one day test interval.

The satisfactory performance of 0-OPT-FP-009 on October 28, 1997, demonstrated that the diesel driven fire pump 1-FP-P-2 was operable during this time frame. The backup motor driven fire pump was tested on September 25, 1997 and again on October 23, 1997, and remained operable during this event. No conditions adverse to safety resulted from this event and the health and safety of the public were not affected.

3.0 CAUSE

The cause for this event was cognitive personnel error.

Station administrative procedure assigns the responsibility for the preparation, coordination, and maintenance of the station's PT scheduling and tracking program to Station Engineering. A list of required PTs and the required due dates are provided to each of the implementing departments. The departments are responsible for developing a schedule to ensure that the PT procedures are performed within the required due date based upon the information provided by Station Engineering.

Operations Checklist OC-44, PT Scheduling Instructions, provides instructions for generating the PT work schedule for upcoming month and for independently verifying the accuracy of the schedule. A daily PT work schedule is provided to each shift listing the procedure number of all procedures required to be performed. After the performance of a procedure, the daily work schedule is initialed to indicate completion. At the end of the shift, the Unit SRO reviews the daily PT work schedule to ensure that the required procedures have been completed or properly carried to another shift. Completed procedures are then sent to Station Engineering for final review.

The individual involved failed to perform proper self check when he signed the daily PT work schedule. He initialed the schedule to indicate that 0-OPT-FP-009 had been completed when in fact he intended to indicate that only 0-OSP-FP-009 had been completed.

4.0 IMMEDIATE CORRECTIVE ACTIONS

The diesel driven fire pump 1-FP-P-2 was declared inoperable for the missed surveillance and the backup motor driven fire pump was declared inoperable because its associated recirculation valve 1-FP-36 was open for water box cleaning. Valve 1-FP-36 was closed and the motor driven fire pump declared operable. PT procedure 0-OPT-FP-009 was

satisfactorily completed and the diesel driven fire pump 1-FP-P-2 was declared operable October 28, 1997.

A Station Deviation Report was submitted.

5.0 ADDITIONAL CORRECTIVE ACTIONS

The individual involved was disciplined for his inappropriate actions.

6.0 ACTIONS TO PREVENT RECURRENCE

Programmatic controls were in place to ensure that the required TS surveillances were appropriately scheduled. Upon completion of the surveillance procedure, supervisory review was required to ensure that the procedure was complete, and that the acceptance criteria had been satisfied or that appropriate actions have been taken. As an enhancement, an additional administrative barrier has been implemented to require the comparison of completed PT procedures with the PT work schedule prior to sending the procedures to Station Engineering. PT procedures not completed as scheduled will be tracked and the SRO notified prior to the end of the grace period of the due date.

7.0 SIMILAR EVENTS

The following previous occurrences at Surry Power Station involved a failure to complete the required surveillance within the TS required frequency. The cause of the events, however, and the subsequent corrective actions were focused on the Electrical Maintenance Department. Programmatic changes were implemented and ownership established to prevent recurrence.

LER 1-95-004, Missed Battery Surveillance Due to Personnel Error. An incomplete Electrical Maintenance PT was processed as complete.

LER 1-95-002, Missed Smoke Detector Surveillance Due to Administrative Process Error. The administrative process for verifying the completion of Electrical Maintenance PTs was weak.

LER 1-94-010, Missed Emergency Diesel Generator Battery Surveillance Due to Personnel Error. Individual responsible for reviewing completed surveillance procedures incorrectly interpreted statements on a PT cover sheet and assumed that the EDG surveillance was complete.

8.0 ADDITIONAL INFORMATION

None