## NOTICE OF VIOLATION

Virginia Electric and Power Company Surry Nuclear Plant Docket No. 281 License No. DPR-37

During an NRC inspection conducted from October 5 through November 15, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification 6.4.A.7 requires detailed written procedures with appropriate instructions shall be provided for preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

Work Order 00375660-02, Procedure O-ECM-1801-01, "Westinghouse Type BF or BFD Relay Replacement" Revision 10, and Temporary Modification (TM) S2-97-8 provided written procedures for the replacement of Relay 1B12 in the Unit 2 "B" Consequence Limiting Safeguards (CLS) logic train.

Safety Evaluation 97-138 for TM S2-97-8 stated that train "B" of Safety Injection would be defeated during the Relay 1B12 replacement and that a formal tracking mechanism be used to ensure that this condition was met.

Contrary to the above, on October 11, 1997, written procedures with appropriate instructions were not provided for maintenance operations on the Unit 2 "B" CLS logic train. Work Order 00375660-02, 0-ECM-1801-01, and TM S2-97-8 did not require the train "B" of Safety Injection be defeated nor did they require a formal tracking system be used to ensure this condition was met as stated in Safety Evaluation 97-138 for the replacement of relay 1B12.

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

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. D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at Surry within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you <u>must</u> specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for you claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia, this <sup>15th</sup> day of December 1997