

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 20, 1996

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 96-225
SPS/VLA/GDM R7
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

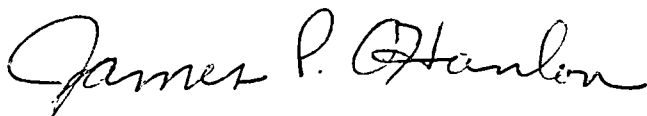
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION AND NOTICE OF DEVIATION
NRC INSPECTION REPORT NOS. 50-280/96-02 AND 50-281/96-02

We have reviewed your Inspection Report Nos. 50-280/96-02 and 50-281/96-02, dated April 19, 1996, and the enclosed Notice of Violation and Notice of Deviation. The cited violation resulted from not following administrative procedural requirements for reporting a weld leak in the radiological control area. As noted in Attachment 1, we have implemented corrective actions to assure that personnel are aware of the procedural requirements for reporting off-normal conditions to the appropriate level of management.

The cited deviation noted that the preventive maintenance program for the circulating water expansion joints had not been conducted consistent with certain commitments made in our June 21, 1993 response (Serial No. 93-163A) on internal flooding. We acknowledge that our preventive maintenance program had not been implemented in accordance with our commitment to have expansion joint inspection activity changes reviewed by the Station Nuclear Safety and Operating Committee (SNSOC). We have taken corrective actions to strengthen our procedures and preventive maintenance program in this area.

We have no objection to this letter being made a part of the public record. Please contact us if you have any questions or require additional information.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

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Attachment

cc: U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Mr. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED ON FEBRUARY 11 - MARCH 23, 1996
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/96-02 AND 50-281/96-02

NRC COMMENT:

“During an NRC Inspection conducted on February 11 through March 23, 1996, a violation of NRC requirements was identified. In accordance with the ‘General Statement of Policy and Procedure for NRC Enforcement Actions,’ NUREG 1600, the violation is listed below:

Technical Specification 6.4 requires that detailed written procedures be provided and followed for preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

VPAP 2002, Work Request and Work Order Tasks, paragraph 6.2.b specifies that any leakage identified in the Radiological Controlled Area (RCA) be reported to the Shift Supervisor. Additionally, paragraph 6.2 specifies that a Work Request (WR) be used to document corrective maintenance deficiencies such as weld leaks.

VPAP 1501, Deviation Reports, requires that deviations be reported on a Deviation Reports (DR).

Contrary to the above, on January 16, 1996, written procedures were not followed for corrective maintenance operation, in that, a leak on a containment penetration weld inside the RCA was not reported to the Shift Supervisor, and this weld leak was not documented on a WR. The weld leak was identified on a maintenance Deficiency Card. Also, this deviation was not reported on a DR. These failures allowed Unit 2 to operate at power for approximately five weeks with a degraded containment penetration.

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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED ON FEBRUARY 11 - MARCH 23, 1996
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Reason for the Violation, or if Contested, the Basis for Disputing the Violation

The violation is correct as stated. The maintenance associated with this violation was incorrectly assigned to the minor maintenance program rather than the safety related maintenance program. The specific reason for the violation is failure of personnel to follow procedures and inadequate controls for data entry into the deficiency card tracking database. The individual identifying the leakage in the Residual Heat Removal (RHR) piping did not recognize the significance of the component. As a result, a deficiency card was submitted for non-safety related minor maintenance and no station Deviation Report was issued. This deficiency card was not processed in accordance with the requirements specified in Virginia Power Administrative Procedure (VPAP) 2002, Work Request and Work Order Tasks. The procedure requires the Operations Maintenance Advisor (OMA) to review submitted deficiency cards to determine if the condition or work identified is appropriately categorized as minor maintenance. The deficiency card was entered into the computerized deficiency card tracking database by the individual who identified the leakage and was subsequently assigned to a responsible department without being reviewed by the OMA. When VPAP-2002 was revised in December 1995 to include the review by the OMA, access to the deficiency card tracking database was not restricted to limit who could enter new items.

Since the OMA review was not performed, the leak in the RHR system was inappropriately processed as minor maintenance and a Deviation Report was not submitted. Also, a work request should have been submitted to repair the leak in the pipe pursuant to VPAP-2002. VPAP-2002 specifies that when a work request is initiated for leakage of valves or components located in the Radiological Controlled Area, the Operations and Health Physics Shift Supervisors are to be notified. Since a work request was not submitted, notification of the Operations Shift Supervisor did not occur. The Health Physics Shift Supervisor was notified of the pipe leak by the decontamination supervisor. However, the Health Physics Shift Supervisor's only responsibility during this event was to ensure that the contamination due to the pipe leak was properly contained and no further radiological controls were required.

Corrective Steps Which Have Been Taken and the Results Achieved

VPAP-1501, Deviation Reports, requires that a Deviation Report be submitted for a degraded safety-related structure. When it was identified that the leak was in the safety-related RHR piping on February 22, 1996, a Deviation Report was submitted.

Outstanding deficiency cards in the computerized tracking system were reviewed by the OMA. The OMA is qualified to determine safety significance and the appropriateness of utilizing the minor maintenance program to address identified deficiencies. No other conditions that would affect compliance with Technical Specifications or that would require a Deviation Report were identified. Each department with assigned deficiency cards was briefed on this incident and given a listing of the outstanding deficiency cards assigned to their department.

Personnel access to the deficiency card tracking database has been restricted to allow only certain authorized individuals access to make data entries. Data entries will only be made after an appropriate review by the OMA or other qualified operations personnel. This will facilitate control and disposition of deficiency cards, thus ensuring consistent and appropriate review by the OMA prior to entries into the database.

Each individual who will continue to have access to edit the deficiency card tracking database received additional instruction on VPAP-2002 requirements for the deficiency card process. This instruction reviewed the deficiency card flow path and the controlling procedure, VPAP-2002.

In addition, the station manager issued a memorandum to station personnel to clarify that through-wall pipe leaks require submittal of a Deviation Report. VPAP-1501 has been revised to clarify this requirement.

Corrective Steps That Will Be Taken to Avoid Further Violations

The actions that have been taken as noted above are sufficient to prevent recurrence.

The Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

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SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/96-02 AND 50-281/96-02

NRC COMMENT:

"During an NRC Inspection conducted on February 11 through March 23, 1996, a deviation of your commitment to reduce the probability of core damage from flooding was identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' NUREG 1600, the deviation is listed below:

The June 21, 1993, letter from Virginia Electric and Power Company to the NRC (Serial No. 93-163A), Additional Information Regarding Internal Flooding, committed to the following in ATTACHMENT 1:

'The expansion joint inspection activity is conducted either during refueling or during other periods of sufficient duration without operational restrictions. The inspection process includes manufacturer's recommendations, operational experience, and engineering judgment.' The manufacturer's technical information recommended that an internal inspection be included as an important element of an inspection program.

'Any future changes to the inspection and replacement activities will be made based on engineering evaluation and by review by the Station Nuclear Safety and Operating Committee (SNSOC), as appropriate.'

Contrary to the above, the formal preventive maintenance inspection program did not include provisions for internal inspections of circulating water rubber expansion joints and changes to the inspection and service life replacement program were not reviewed by SNSOC. A preventive maintenance task evaluation processed in January, 1996, revised the inspection frequency of the circulating water rubber expansion joints from every refueling outage to every other refueling outage without SNSOC review.

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Reason for Deviation or, if Contested, the Basis for Disputing the Deviation

There are two elements identified in the cited deviation - internal inspections of expansion joints and changes to inspection frequency without SNSOC review. The first element of the deviation is not correct as stated, and the second is correct as stated. Each of these elements is discussed separately in the following paragraphs.

Internal Inspections of Expansion Joints - Attachment 1 of our June 21, 1993 letter identified the expansion joint inspection activities which include visual inspections of retaining hardware, expansion joint exterior surfaces, and expansion joint to flange alignment. Inspection of internal surfaces was not included in this commitment. In the same letter, it was stated that the inspection process includes manufacturer recommendations, operational experience, and engineering judgment. This statement was not intended to indicate that all manufacturer recommendations would be included in our inspection process, but instead was intended to indicate that the manufacturer recommendations were considered in originally developing the expansion joint inspection program.

As indicated by exclusion from the defined visual inspection activities in our June 21, 1993 letter, the original inspection program did not include internal inspections. Although the program and procedure specifying inspection activities do not include internal inspections, it is our practice to conduct internal surface inspections when practical. As noted in the inspection report, internal inspections have been conducted during past outages with no indication of degradation.

Inspection Frequency Changes Without SNSOC Review - In the June 1993 time frame, the expansion joint inspections were specified (in model work orders) to be performed during every refueling. Recently, a Preventive Maintenance (PM) task evaluation was completed and recommended revision of the inspection frequency to every other refueling outage. The inspection report indicates that the PM task evaluation was implemented without SNSOC approval. The review for the inspection frequency changes was not accomplished in accordance with our commitment to have expansion joint inspection activity changes reviewed by SNSOC. This commitment was not incorporated into appropriate procedures because expansion joint inspection frequency changes were not initially considered as part of the commitment for SNSOC review of inspection activity changes.

Corrective Steps Which Have Been Taken and the Results Achieved

Internal Inspections of Expansion Joints - During a recent task team review of expansion joint inspection activities, manufacturer recommendations regarding internal inspection of the expansion joints were revisited. The conclusion reached and supported by documentation from the expansion joint vendor is that, if exterior inspections are conducted routinely, internal inspections are not mandatory. Furthermore, an operating experience review item addressing the recent failure of an expansion joint at a similar plant is undergoing review. Preliminary conclusions from this operating experience review agree that internal inspections are not required as long as proper external inspections and replacements are performed in accordance with the defined schedule. Based on these conclusions, it is not necessary to revise our program to require internal expansion joint inspections.

Fourteen expansion joints were internally inspected during the last Unit 1 and Unit 2 refueling outages. These internal inspections did not identify any significant degradation.

Inspection Frequency Changes - Model work orders, which specify the frequency of expansion joint inspections, have been revised to require an eighteen month inspection frequency. In addition, the model work orders have also been revised to specifically require SNSOC review of any proposed frequency change consistent with our commitment.

The actual inspections conducted (i.e., visual inspections of retaining hardware, expansion joint exterior surfaces, and expansion joint to flange alignment) are specified in Mechanical Corrective Maintenance procedure, 0-MCM-1003-01, Expansion Joint Removal, Inspection, and Installation. This procedure has been revised to specifically require SNSOC review of any proposed inspection change consistent with our commitment.

During the ongoing Unit 2 refueling outage, four expansion joints are being inspected, and sixteen expansion joints are being replaced.

Corrective Steps That Will Be Taken to Avoid Further Deviations

The VPAP-0803, Preventive Maintenance Program, will be revised to require SNSOC review of PM task evaluations and PM deferrals for expansion joints.

The Date When Corrective Action Will Be Completed

The Station Administrative Procedure revision for the PM Program cited above will be completed by June 30, 1996.