

January 30, 1997

Virginia Electric and Power Company  
ATTN: Mr. J. P. O'Hanlon  
Senior Vice President - Nuclear  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060

SUBJECT: RESPONSE TO COMMENTS ON SURRY SYSTEMATIC ASSESSMENT OF LICENSEE  
PERFORMANCE (SALP) REPORT - INSPECTION REPORT NOS. 50-280/96-99  
AND 50-281/96-99

Dear Mr. O'Hanlon:

Thank you for your response dated November 26, 1996, which provided comments on the Surry SALP Report which was issued on November 8, 1996.

Based on your comments, the SALP Board reconvened on December 19, 1996, and reviewed the information that you provided. After considerable deliberation, the SALP Board determined that although performance improved, an adjustment of the SALP score in the Maintenance area was not warranted. The reasons are stated in the enclosure.

Should you have any questions concerning this matter, please contact us.

Sincerely,

Original signed by Luis A. Reyes

Luis A. Reyes  
Regional Administrator

Docket Nos. 50-280, 50-281  
License Nos. DPR-32, DRP-34

Enclosure: NRC Evaluation and Conclusions

cc w/encl:  
M. L. Bowling, Manager  
Nuclear Licensing & Operations Support  
Virginia Electric & Power Company  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060

cc w/encl continued: See page 2

9702110064 970130  
PDR ADOCK 05000280  
G PDR

11  
L.A.

cc w/encl: Continued  
David A. Christian, Manager  
Surry Power Station  
Virginia Electric & Power Company  
5570 Hog Island Road  
Surry, VA 23883

W. R. Matthews, Manager  
North Anna Power Station  
P. O. Box 402  
Mineral, VA 23117

Ray D. Peace, Chairman  
Surry County Board of Supervisors  
P. O. Box 130  
Dendron, VA 23839

Dr. W. T. Lough  
Virginia State Corporation Commission  
Division of Energy Regulation  
P. O. Box 1197  
Richmond, VA 23209

Michael W. Maupin  
Hunton and Williams  
Riverfront Plaza, East Tower  
951 E. Byrd Street  
Richmond, VA 23219

Robert B. Strobe, M.D., M.P.H.  
State Health Commissioner  
Office of the Commissioner  
Virginia Department of Health  
P. O. Box 2448  
Richmond, VA 23218

Attorney General  
Supreme Court Building  
900 East Main Street  
Richmond, VA 23219

Distribution w/encl: See page 3

Distribution w/encl:

G. Edison, NRR  
 R. Gibbs, RII  
 P. Fillion, RII  
 D. Jones, RII  
 W. Stansberry, RII  
 C. Payne, RII  
 PUBLIC

NRC Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 Surry Nuclear Power Station  
 5850 Hog Island Road  
 Surry, VA 23883

NRC Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 1024 Haley Drive  
 Mineral, VA 23117

OFFICE	RII:DRP	RII:DRP	HQ:NRR	RII:ORA		
SIGNATURE	<i>AB</i>	<i>JJ</i>	<i>F</i>	<i>EM</i>		
NAME	GBelisle alt	JJohnson	FReinhart	EMerschhoff		
DATE	01 / 16 / 97	01 / 16 / 97	01 / 16 / 97	01 / 29 / 97	01 / / 97	01 / / 97
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\SUSALP.CTS

NRC'S EVALUATIONS AND CONCLUSIONS ON VIRGINIA ELECTRIC & POWER COMPANY'S  
(VEPCO) RESPONSE TO THE SURRY SALP REPORT

By letter dated November 26, 1996, VEPCO provided comments on the Surry SALP Report which was issued on November 8, 1996. The comments involved equipment related performance improvements, resolution plans, work control process improvements, and human performance.

1. NRC Evaluation of Comments on Equipment Related Performance Improvements

- VEPCO stated that the Rod Control system performance has dramatically improved, that there have been no Rod Control system related reactor trips since May 1995 and no rod urgent failures since September 1995.

The Board agreed that the Rod Control system performance has improved. The Board had recognized this improved performance in the Maintenance and Engineering areas of the SALP Report.

- VEPCO described replacements of the Service Water/Circulating Water system traveling screens which increased the reliability of plant components and reduced the requirements for corrective maintenance support by operations and other plant personnel.

The Board agreed that these improvements increased component reliability and had given credit for these improvements in the Maintenance area of the SALP report.

- VEPCO stated that improvements were implemented in the testing of the Turbine Driven Auxiliary Feedwater (TDAFW) Pumps which resulted in improved reliability.

The Board did not discuss the specific TDAFW pump improvements during the SALP board but did review and discuss safety systems' availability information. When the SALP Board reconvened, TDAFW pump improvements were discussed. The equipment unavailability figures provided for the January - December 1995 and the January - September 1996 time frames do show improvement.

- VEPCO stated that several maintenance activities were focused on assuring continuing long term plant performance. These included rebuilding of Circulating Water Pumps, replacement of Emergency Diesel Generator fuel oil supply lines, replacement of Station Service Transformer cables, and replacement of Radiation Monitoring System Components with digital equipment.

The Board considered these to be examples of good maintenance practices. They were considered along with other examples in arriving at the Maintenance SALP rating. The Board had specifically documented improvements to the Radiation Monitoring system components with digital equipment in the Maintenance area of the SALP Report.

ENCLOSURE

## 2. NRC Evaluation of Comments on Resolution Plans

- VEPCO stated that formal resolution plans for improving performance of important equipment were initiated in early 1996 and, as a result, management attention and station resources have continued to be focused on improving long term equipment performance.

The Board discussed and acknowledged plans to improve future performance, and it will reserve judgement pending observation and verification of future improved performance.

## 3. NRC Evaluation of Comments on Work Control Process Improvements

- VEPCO stated that several work control process improvements were implemented during the SALP period which improved the effectiveness and efficiency of maintenance. These included improvement in the availability of safety equipment and reductions in the numbers of open work packages, minor maintenance items and catch containers.

The Board considered safety system availability, assessed it to be good, and gave credit for the availability of safety equipment. The Board also gave credit for the Fix-It-Now Program and various processes considered during the assessment. The Board acknowledges that minor maintenance items improved and that the number of catch containers decreased in the latter part of the SALP cycle. During the onsite visit of a SALP Board member at the end of the SALP interval, the NRC noted that the maintenance rule implementation appeared to be a significant challenge to the Surry maintenance program; this was discussed with plant management.

## 4. NRC Evaluation of Comments on Human Performance

- VEPCO stated that Surry has focused on improving human performance through training and coaching, reinforcing basic values, and routinely observing work in progress. VEPCO also stated that the number of Licensee Event Reports (LERs) and Level IV violations related to maintenance activities has improved over the SALP cycle. VEPCO also noted that an issue involving the hydrogen analyzers was the result of problems occurring several years ago. VEPCO further stated that "these programmatic improvements" have resulted in improved plant performance.

The Board fully considered the LERs and NRC violations during the SALP period. The issues involving the hydrogen analyzers were fully evaluated. The Board agrees and noted these improvements over the SALP period and also noted improvements during the last six months of the SALP cycle. The Board also evaluated VEPCO's comments on human performance and noted slight improvement in this area but no marked changes.

The Board specifically reviewed VEPCO's performance during the last six months of the SALP cycle in determining the SALP rating. During the Board's meeting on December 19, 1996, this information was reviewed again.

Based on this review, the Board determined that VEPCO's maintenance activities were normally well focused and resulted in a good level of safety performance. This was indicated by improvements to the upper and lower intake level travelling screens, replacement of the feedwater pump motors and improvements in the switchgear room air conditioning.

VEPCO's programs and procedures normally provided the necessary control of activities but there were deficiencies. For example, procedural deficiencies resulted in flooding in the turbine building; during station battery maintenance, procedures were inadequate to meet technical specification requirements for application of anti-corrosion coating; and, hydrogen analyzers were determined to be inoperable due to procedural deficiencies.

VEPCO's self assessments were considered to be, in general, very good. Corrective actions were usually effective, although on occasion were not complete. For example, repeated efforts throughout the SALP cycle failed to correct the Unit 2 letdown line leaks at welded joints. This matter still has not been corrected as of the date of this letter. In another example, commitments to the NRC to minimize risk of core damage from flooding had not been met. A preventive maintenance program for rubber expansion joints in the circulating water system was modified without safety review committee approval, resulting in deferral of preventive maintenance at variance with vendor recommendations.

In conclusion, while improvement was noted, an adjustment of the SALP rating was determined to be not warranted.