

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

January 8, 1997

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

Serial No. 96-632  
SPS:BAG/GDM R5'  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

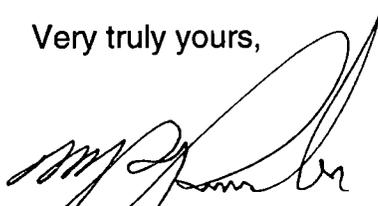
**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNIT 1 AND UNIT 2**  
**REPLY TO A NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT NOS. 50-280/96-11 AND 50-281/96-11**

We have reviewed Inspection Report Nos. 50-280/96-11 and 50-281/96-11 dated December 9, 1996 and the enclosed Notice of Violation (NOV) for Surry Units 1 and 2. The report identified one cited violation for the failure to align the Spent Fuel Pit Cooling System according to the approved system valve alignment procedure. As described in our attached reply to the NOV, we have concluded that this event was caused by the lack of a consistent process for implementation of revisions to system valve alignment procedures.

The specific alignment discrepancy cited in the violation has been corrected. We have implemented process changes to ensure consistency in implementation of revisions to system valve alignment procedures. These process changes will be incorporated into Virginia Power Administrative Procedures. We have also conducted a review of completed system valve alignment procedures, as described in the attachment. This review resulted in no discrepancies affecting plant system operation, although physical verification of some valve alignments cannot be completed until the next scheduled refueling outages. Based on the extent of this review in conjunction with system performance and testing, we believe that configuration control relative to system valve alignment procedures has been and continues to be maintained.

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

Very truly yours,

 FOR  
James P. O'Hanlon  
Senior Vice President - Nuclear

Attachment

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cc: U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W., Suite 2900  
Atlanta, Georgia 30323

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

**REPLY TO A NOTICE OF VIOLATION**  
**NRC INSPECTION CONDUCTED SEPTEMBER 29 - NOVEMBER 9, 1996**  
**SURRY POWER STATION UNITS 1 AND 2**  
**INSPECTION REPORT NOS. 50-280/96-11 AND 50-281/96-11**

**NRC COMMENT:**

"During an NRC inspection conducted on September 29 through November 9, 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.A.1 requires that written procedures with appropriate check-off lists and instructions shall be provided for the normal startup, operation, and shutdown of all systems and components involving nuclear safety of the station. Additionally, Technical Specification 6.4.D requires that all procedures described in Specification 6.4.A shall be followed.

Site Procedure 0-OP-FC-001A, Spent Fuel Pit Cooling System Alignment, Revision 0, requires that valve 1-FC-36, Spent Fuel Pit Pumps Suction Header Crosstie Isolation, be in the open position during normal operation of the Spent Fuel Pit Cooling system.

Contrary to the above, on November 6, 1996, the Spent Fuel Pit Cooling System was aligned for normal operation and valve 1-FC-36 was found to be in the closed position.

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

**REPLY TO A NOTICE OF VIOLATION**  
**NRC INSPECTION CONDUCTED SEPTEMBER 29 - NOVEMBER 9, 1996**  
**SURRY POWER STATION UNITS 1 AND 2**  
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**1. Reason for the Violation, or, if Contested, the Basis for Disputing the Violation**

The violation is correct as stated. The reason for the violation was the lack of a consistent process for implementation of revisions to system valve alignment procedures.

System valve alignment procedures are revised as a result of design changes, miscellaneous station drawing updates, and Operations or Engineering Department requests. The Operations Department proposed a change to the Spent Fuel Pit Cooling System alignment procedure to provide operational flexibility when swapping the 1A and 1B Spent Fuel Pit Pumps. In accordance with the procedure change process, Operations reviewed and validated the alignment procedure prior to approval. On April 4, 1996, the Station Nuclear Safety and Operating Committee (SNSOC) approved the upgraded procedure 0-OP-FC-001A, Spent Fuel Pit Cooling System Alignment. The revision affected the valve position for the spent fuel pit pumps' suction header crosstie isolation valve 1-FC-36 and changed its position from normally closed to normally open. The change in this valve position was determined not to affect system performance or plant safety.

After SNSOC approval, a working copy of the procedure was issued to administrative personnel in Operations and the procedure was placed in the Operations' procedure book for system valve alignment procedures. Due to the lack of a consistent process for implementation of revisions to system valve alignment procedures, the procedure was inadvertently not scheduled to be performed nor was it sent to the Operations Shift Supervisor for review and implementation. Operations Administrative Procedure OPAP-0002, Operations Department Procedures, states that after initial valve alignments, re-performance of the alignment is only necessary prior to system start-up after a major maintenance outage, refueling outage or as required by the Operations Shift Supervisor.

**2. Corrective Steps Which Have Been Taken and the Results Achieved**

A station deviation report was submitted.

The Spent Fuel Pit Cooling System Alignment procedure was performed on November 6, 1996. The spent fuel pit pumps' suction header crosstie isolation valve 1-FC-36 was found in the closed position and was opened in accordance with the system alignment procedure. System operation was not affected by the cross connect valve position since both pump suction header valves were in their normal open position. As a result of the Spent Fuel Pit Cooling System alignment review, drawing inconsistencies for three valves were discovered. These inconsistencies do not affect system performance or plant safety, and are being addressed by our Corrective Action Program.

A review of other completed system valve alignment procedures was conducted. This review was performed on approximately 80% of the total population of system valve alignment procedures. Specifically, the latest revision of the procedure was compared to the revision of the procedure most recently completed to verify that the current system valve alignment was correct. The review identified instances in which differences existed between the latest revision and the documented valve lineup. For these differences (where valve positions were changed or valves were added), the positions of valves accessible during normal plant operation were physically verified to be in the correct position. No discrepancies were identified that affect plant system operation, however, valve positions for the Fish Screen Wash System at the low level intake structure were found in positions contrary to the valve alignment procedure. A station deviation report was submitted for that instance, and the valves were positioned in accordance with the alignment procedure. The deviation report was subsequently dispositioned concluding that there was no impact on system operability.

Based on the extent of this review, we believe that configuration control relative to system valve alignment procedures has been and continues to be maintained. Furthermore, based on this review, system performance, and surveillance testing, we are confident that the safety systems are properly aligned to perform their safety function.

Process changes have also been put into place to ensure consistency in implementation of revisions to system valve alignment procedures. Specifically, the changes require notification of specified Operations management when system valve alignment procedure revisions are approved and define responsibility within the Operations Department for the implementation of revised system alignment procedures.

### **3. Corrective Steps Which Will be Taken to Avoid Further Violations**

The remaining physical verification of differences associated with documented valve alignment for valves not accessible during normal plant operation will be completed during the next two scheduled refueling outages. This schedule for

completion is necessary primarily because in-containment access is required and/or the system continues to be in service (i.e., shared systems common to both units). If discrepancies are identified, appropriate corrective actions will be taken. System performance and/or testing indicates proper system valve alignment.

Virginia Power Administrative Procedure revisions incorporating the process changes for system valve alignment procedure revision implementation will be completed by the end of first quarter 1997.

Corrective actions associated with the review of the drawing inconsistencies will be implemented upon completion of the review.

#### **4. The Date When Full Compliance Will be Achieved**

Full compliance was achieved with respect to the cited violation when the spent fuel pit pumps' suction header crosstie isolation valve 1-FC-36 was opened and process changes were put into place to ensure consistency in implementation of revisions to system alignment procedures.

The NRC Resident Inspectors will be briefed on the disposition of the corrective actions associated with the review of the drawing inconsistencies.

## SUMMARY OF COMMITMENTS

The following is a summary of commitments in response to the Notice of Violation in NRC Inspection Report Nos. 50-280/96-11 and 50-281/96-11.

The remaining physical verification of differences associated with documented valve alignment for valves not accessible during normal plant operation will be completed during the next two scheduled refueling outages. If discrepancies are identified, appropriate corrective actions will be taken.

Virginia Power Administrative Procedure revisions incorporating the process changes for system valve alignment procedure revision implementation will be completed by the end of first quarter 1997.

The NRC Resident Inspectors will be briefed on the disposition of the corrective actions associated with the review of the drawing inconsistencies.