VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 7, 1994

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

Serial No. 94-606
SPS/VAS/ETS R6
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

NOV 07 1994

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/94-24 AND 50-281/94-24

We have reviewed your Inspection Report Nos. 50-280/94-24 and 50-281/94-24 dated October 6, 1994 and the enclosed Notice of Violation. We share your concern over the delay in sampling of the Auxiliary Ventilation System adsorber material and the related causal factors of inadequate procedural controls, communications, management oversight, and delegation of specific authority. We comprehensively and independently evaluated the event for both specific and broader implications and have taken actions to prevent a recurrence. Additionally, we plan to independently evaluate the effectiveness of the Station Nuclear Safety and Operating Committee. We will share the results with you when the evaluation is completed.

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

James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

JE01

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 AUGUST 7 - SEPTEMBER 2, 1994
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/94-24 AND 50-281/94-24

NRC COMMENT:

"During an NRC inspection conducted on August 7 through September 2, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50, Appendix B, Criterion XVI, as implemented by the Operational Quality Assurance Program Topical Report (VEP-1-5A, Section 17.2.16) requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, on June 16, 1994, established measures to assure that conditions adverse to quality were promptly identified and corrected, were ineffective. Specifically, a chemical release occurred in containment on June 16, 1994, which resulted in a condition adverse to quality when both trains of the Auxiliary Ventilation Exhaust Filter system were exposed to materials that degraded the adsorption efficiency of the in place charcoal filters. However, sampling of the filters was not performed until June 28, 1994, for train "A" and July 28, 1994, for train "B".

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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED AUGUST - SEPTEMBER 2, 1994
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/94-24 AND 50-281/94-24

1. Reason for the Violation, or, if Contested, the Basis for Disputing the Violation

On June 16, 1994, after a high level of ammonia odor was noted in containment, the containment was evacuated and a second containment purge fan was started to purge containment. Containment atmosphere samples were taken to determine the level of ammonia and hydrazine present. Shortly after the occurrence, the event was reviewed by station management to assess safety significance, regulatory compliance and the impact on plant systems. The charcoal supplier and the hydrazine manufacturer were contacted and confirmed that the measured ammonia and hydrazine concentrations present on June 16, 1994 would not affect the charcoal adsorber efficiency. There were no other technical concerns or Limiting Conditions of Operation (LCO) applicable to the charcoal adsorber at the time which could adversely affect a determination of continued operability.

Regardless, station management determined that the charcoal adsorbers were required to be sampled in accordance with Technical Specifications (TS). However, this determination was not acted on in a timely manner due to ineffective communications. Additionally, TS do not specify a time period in which to obtain samples. Since there was no applicable Limiting Condition of Operation in effect at that time there was no formal process that would have initiated an oversight organization review of the timing of the sampling.

A contributing factor is that this specific surveillance requirement is event driven (i.e., Technical Specifications require sampling after fire, chemical spill or painting in areas that communicate with the ventilation systems but does not specify the time for this sampling). Given the determination that the adsorbers remained operable pending sample analysis, there were inadequate procedural controls in place to ensure this event driven surveillance testing was completed in a timely fashion.

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

Management initiated two independent assessments of the event, the first to understand more fully the detailed cause of the event and the second, a management overview, to determine if broader management issues existed. The results of these two assessments were reviewed by senior management, and specific corrective actions have been initiated as detailed below.

Station management presented the results of the assessments of the event to station supervision. As part of this presentation the following expectations were emphasized 1) the importance of effective communications coupled with a "questioning attitude," 2) high standard for safe operation and compliance with Technical Specifications, and 3) the need to identify issues requiring increased attention to management. Station supervision has also provided briefings to plant personnel to reinforce communications, accountability, and a "questioning attitude."

Procedures that affect the operation and testing of the ventilation systems have been reviewed. Changes have been made to ensure appropriate instructions are in place to direct the sampling and testing of the charcoal adsorbers when necessary, including event driven surveillances. In addition, the remaining Technical Specifications were reviewed to ensure that other event driven actions or surveillance requirements had adequate procedural controls. If procedural control was not considered to be adequate, the applicable procedures were revised to ensure the specified action or surveillance would be completed when necessary.

A Licensee Event Report (LER S1-94-008) was submitted in accordance with 10 CFR 50.73. In addition, information concerning the charcoal degradation was shared with the industry through the INPO Operating Experience network.

The nearly identical loss of efficiency for removal of methyl iodide in both the 3A and 3B trains of the charcoal adsorber banks indicates that a common source contaminant likely caused the charcoal degradation. There is no available objective evidence, however, to clearly identify the chemical that caused the loss of efficiency. Therefore, additional samples were taken of the 3A and 3B charcoal adsorbers approximately 90 days after unit restart. These samples were analyzed to verify that the degradation in the charcoal adsorber efficiency was limited to a mechanism present only during the outage and to ensure that the existing charcoal adsorber continued to be meet Technical Specifications requirements. The sample analyses confirmed continued acceptability of the replaced charcoal adsorbers.

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

As noted above the reviews to ensure adequate procedures for event-driven Technical Specification surveillances should preclude a repeat of this specific violation. The lessons learned from the Unit 2 SGCC have been included into the planning process and will be implemented during the Unit 1 SGCC.

4. The Date When Full Compliance Will be Achieved

Full compliance was achieved when the 3B charcoal adsorber was replaced and returned to service on August 4, 1994.