VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

January 28, 1994

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Serial No.: 94-016
SPS/VAS/GDM R18
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
NRC INSPECTION REPORT NOS. 50-280/93-26 AND 50-281/93-26

We have reviewed your Inspection Report Nos. 50-280/93-26 and 50-281/93-26 dated December 30, 1993, and the enclosed Notice of Violation. As described in the attached reply to the Notice of Violation, we have evaluated the circumstances that led to the violation and have initiated appropriate corrective actions.

Should you have any questions or comments, please contact us.

Very truly yours,

W. L. Stewart

Attachment

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

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

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REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED NOVEMBER 7 - DECEMBER 4, 1993
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/93-26 AND 50-281/93-26

NRC COMMENT:

"During an NRC inspection conducted on November 7 through December 4, 1993, 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 III, as implemented by Operational Quality Assurance Program Topical Report (VEP 1-5A, Section 17.2.3), collectively require that measures be established to assure that the design basis as specified in the license application are correctly translated into specifications, drawings, procedures, and instructions.

Section 2.3.1.2.2 of the Updated Final Safety Analysis Report requires that the two emergency service water pump building doors be equipped with removable watertight seal plates to protect against flooding when the possibility of a flood is anticipated.

Contrary to the above, the seal plates installed in front of the emergency service water pump building doors on August 31, 1993, were not watertight. The seal plates were installed to protect the building against the potential for flooding when Hurricane Emily was projected to be in the area.

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

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1) **Reason for the Violation, or, if Contested, the Basis for Disputing the Violation**

The violation occurred due to an inadequate procedure that resulted in non-compliance with the UFSAR. Section 2.3.1.2.2 of the Updated Final Safety Analysis Report (UFSAR) states that the Emergency Service Water (ESW) pump house doors will be equipped with removable watertight seal plates to protect the ESW pump diesels against flooding when the possibility of a flood is anticipated. The procedure required installation of the seal plates but did not provide information for ensuring the seal plates were completely watertight.

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

After it was determined that the ESW pump house door seal plates were not completely watertight as installed on August 31, 1993, a station Deviation Report was submitted. An engineering walkdown and a review of the installation and the need for watertightness of the seal plates were performed. Initial engineering evaluations determined that the seal plates as installed would result in only minor inleakage with no effect on the operability of the ESW pump diesels. Pending completion of engineering reviews and corrective actions, plastic sheeting and sandbags were staged in the ESW pump house to augment the seal plates.

Further engineering evaluation has determined that it is not necessary for the seal plates to be completely watertight. Measurements were made and a calculation was performed to determine the consequences of inleakage. The engineering evaluation determined that the seal plates are only required to limit inleakage such that operability of the ESW pump diesels and their support equipment would not be affected. Based on this evaluation and with no further operator actions, the seal plates as installed on August 31,1993 were determined to be adequate for limiting inleakage such that the ESW pump diesels and support equipment would remain operable during the design base hurricane.

A safety evaluation was completed to document the acceptability of the modified design basis requirements, and the appropriate procedures were revised to provide the necessary instructions to ensure that installation of the seal plates restricts inleakage to within acceptable limits.

3) **Corrective Steps That Will be Taken to Avoid Further Violations**

Based on the engineering and safety evaluations discussed above, a UFSAR change request is being prepared to clarify the flooding protection requirements and capabilities of the ESW pump house door seal plates.

As we have previously stated, when deviations associated with the UFSAR are discovered, they will be documented and evaluated in accordance with our corrective action program. A timely evaluation of their safety significance will be completed and actions initiated based on the conclusions and recommendations of the evaluation.

4) **The Date When Full Compliance Will be Achieved**

Full compliance was achieved when the safety evaluation that documented the acceptability of the modified design basis and the procedure changes that address seal plate installation were approved. (The UFSAR change will be completed and submitted to the NRC in the next UFSAR revision in accordance with the schedule provided in 10 CFR 50.71(e).)