

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 7, 1989

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

Serial No. 89-367
NL/RPC:vlh R2
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. 50-280/89-10 AND 50-281/89-10

We have reviewed your letter dated May 9, 1989, in reference to the NRC inspection conducted on March 27-April 4, 1989, for Surry Power Station. The inspection was reported in Inspection Report Nos. 50-280/89-10 and 50-281/89-10. Our response to the violation described in the Notice of Violation is provided in Attachment I. Additionally, the inspection report documents statements concerning the intent of portions of our comprehensive Motor Operated Valve (MOV) correction effort. A formal clarification of the positions associated with these statements is enclosed in Attachment II.

Please reference our letter (Serial No. 89-275) dated April 19, 1989, which provides our MOV Action Plan and its schedule for implementation. This program is presently being implemented as discussed in the referenced letter.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Power

cc: U. S. Nuclear Regulatory Commission
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ATTACHMENT I

REPLY TO A NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTIONS
ON MARCH 27 - APRIL 4, 1989
INSPECTION REPORT NOS. 50-280/89-10 AND 50-281/89-10

NRC Comment

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 27-April 4, 1989, 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 (1989), the violation is listed below:

10 CFR 50 Appendix B, Criterion XVI and the licensee's accepted Quality Assurance Program (VEP 1-5A, Section 17.2.6) collectively require that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, measures were not adequate to assure conditions adverse to quality were corrected nor the cause of the condition determined for problems identified by the licensee with valves 1-CH-MOV-1286B in 1988 (inadequate actuator grease), 2-CH-MOV-2289A in 1986 (damaged valve disk) and 2-CH-MOV-2289B in 1987 (excessive valve stroke times). These valves are included in the licensee's IE Bulletin 85-03, Motor Operated Valve Common Mode Failure During Plant Transients Due to Improper Switch Settings program.

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

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RESPONSE:

(1) **ADMISSION OR DENIAL OF THE VIOLATION:**

The violation is correct as stated.

(2) **REASON FOR THE VIOLATION:**

The violation resulted from a failure to promptly initiate or properly administer maintenance activities.

(3) **CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:**

The motor operator on Valve 1-CH-MOV-1286B has been cleaned, inspected, regreased, and tested to verify satisfactory operation.

Valve 2-CH-MOV-2289A was disassembled and inspected. The overall condition of the valve was found to be good with component parts within specification. However, because the valve stem was noted to have a slight bend and replacement parts were available, the stem was replaced.

The increased running load and stroke time for valve 2-CH-MOV-2289B was attributed to an increase in the packing load which resulted from maintenance activities. No degradation of the valve or operator was indicated. The valve was reassembled and tested with satisfactory stroke times.

(4) **CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:**

As indicated in our letter (Serial No. 89-275) dated April 19, 1989, a comprehensive MOV Program was developed from industry, INPO, and NRC experience that will maintain MOVs within specification. The ongoing MOV effort provides the necessary assurance, through extensive maintenance and testing, that the MOVs will function as required for safe plant operation.

The MOV Program specifically addresses the frequency of grease inspections, the use of standardized lubricants, the criteria for grease acceptance, and the training of individuals involved in grease inspection and analysis. An inspection verification program is included which will periodically assess MOVs suspected of degradation as well as a sample of MOVs indicating acceptable performance. These inspections will confirm that the trending process is effective in identifying MOV equipment degradation before it becomes significant. The trending program will review and analyze MOV stroke times among other parameters. Criteria have already been established for use in evaluating excessive stroke time. Ongoing procedure review and revision and enhanced training for personnel involved with each aspect of the MOV Program are part of the program.

(5) **THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

The MOV Program is presently approved and being implemented. Full compliance will be achieved by September 1, 1989.

ATTACHMENT II

CLARIFICATION OF STATEMENTS IDENTIFIED IN INSPECTION REPORT NOS. 50-280/89-10 AND 50-281/89-10

In order to correct any misunderstanding regarding specific actions being taken as part of the comprehensive MOV correction effort and statements documented in paragraph 2b of the inspection report, two items are clarified below:

- 1) It is not our intended course of action to replace the 440 volt motors with 460 volt motors. It has been determined that, because the intermittent duty motors used for MOVs have such short operating times and are infrequently operated, the impact of overvoltage and testing on motor life is negligible.
- 2) It was noted in Inspection Report 89-10 that MOVATS test reports issued prior to 1988 would be reviewed as part of the recovery program. We note that because of the effect of certain maintenance activities on the parameters involved in the MOVATS signature curves, only the most recent MOVATS test reports contain curves with currently meaningful information. Therefore, the most recent MOVATS test report is being reviewed for each valve, although older test reports may selectively be consulted in reviewing a particular valve. Also, each valve's work history is being reviewed back to 1985.

These clarifications were discussed with the cognizant NRC inspector (S. Tingen) during a followup MOV inspection the week of June 6, 1989.