

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 27, 1989

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

Serial No.: 89-715
SPS/GDM/pmk
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. 50-280/89-24 AND 50-281/89-24

We have reviewed your letter dated September 28, 1989, in reference to the NRC inspection conducted from July 30, 1989 - September 2, 1989, for Surry Power Station. The inspection was reported in Inspection Report Nos. 50-280/89-24 and 50-281/89-24. Our response to the violations described in the Notice of Violation is provided in the Attachment.

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 for

W. L. Stewart
Senior Vice President - Power

Attachment

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

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

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ATTACHMENT

Response to Notice of Violation Reported During the NRC
Inspection From July 30, 1989 - September 2, 1989
Inspection Report Nos. 50-280/89-24 and 50-281/89-24

NRC Comment:

"During the Nuclear Regulatory Commission (NRC) inspection conducted between the period of July 30 to September 2, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

- A. Technical Specification 3.0.1 requires, in part, that if a requirement cannot be satisfied, the unit shall be placed in at least hot shutdown within 6 hours unless corrective measures are completed that permit operation under the permissible action statement.

Contrary to the above, Technical Specification 3.0.1 requirements were not complied with in that, upon discovery of a missed surveillance in Technical Specification 4.1.A.2, Unit 1 entered Technical Specification 3.0.1 at 1320 hours on August 15, 1989, and was not placed in hot shutdown nor were the corrective actions completed that would permit operation until 1620 hours on August 16, 1989.

This is a Severity Level IV violation (Supplement I) and applies to Unit 1 only.

- B. Technical Specification 6.4 requires, in part, that procedures for the testing of components and systems involving nuclear safety of the station shall be followed.

Contrary to the above, a procedure for testing of components was not followed, in that, on August 1, 1989, during performance of periodic testing of the Unit 1 turbine driven auxiliary feedwater pump, operators made adjustments to the turbine speed which were not in accordance with the procedure in effect, 1-PT-15.1C, Turbine Driven Auxiliary Feedwater Pump (1-FW-P-2), dated July 25, 1989.

This is a Severity Level IV violation (Supplement I) and applies to Unit 1 only.

- C. Technical Specification 4.6.C. requires the station batteries to be tested within specific intervals. Technical Specification 4.0.2 further allows a plus or minus 25 percent adjustment of the test interval to accommodate normal test schedules.

Contrary to the above, station battery testing was not accomplished, in that, from August 1988 through August 1989, 11 battery surveillance tests were not performed within the required interval.

This is a Severity Level IV violation (Supplement I) and applies to both units."

Response to Notice of Violation
Inspection Report Nos. 50-280/89-24 and 50-281/89-24

Violation A

RESPONSE:

(1) Admission or Denial of Alleged Violation:

The violation is correct as stated.

(2) Reason for the Violation:

The violation was caused by personnel error, in that a Justification for Continued Operation (JCO) was improperly used to exit a Technical Specification action statement. When it was discovered that surveillance testing of the P-10 interlock logic had possibly been missed, a six hour action statement was entered as required by Technical Specification 3.0.1. A JCO was prepared, approved by SNSOC, and then used as a basis for exiting Technical Specification 3.0.1. Although the JCO provided adequate compensatory measures to assure continued safe operation, it was an inappropriate means of exiting an action statement. The requirements of the action statement should have been complied with, or a request made to the NRC for discretionary enforcement.

(3) Corrective Steps Which Have Been Taken and the Results Achieved:

Testing of the P-10 interlock logic was completed on August 16, 1989 with satisfactory results.

Station Procedure SUADM-LR-12, which governs the preparation of safety evaluations, was revised on October 10, 1989 to include instructions on the preparation and use of JCOs. The revised procedure explicitly states that a JCO alone may not be used to exit a Technical Specification action statement.

A memorandum was issued to station supervisors on October 24, 1989 outlining the revised requirements of SUADM-LR-12.

(4) Corrective Steps Which Will Be Taken to Avoid Further Violations:

Annual training is required for personnel who prepare and review safety evaluations including those required for JCOs. This training will review the requirements and utilization of a JCO. As a further enhancement, a Technical Specification change, which would allow a 24 hour period to complete a missed surveillance prior to entering the applicable action statement, will be submitted for NRC approval, consistent with the guidance of Generic Letter 87-09.

(5) Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 10, 1989, when the revision to SUADM-LR-12 was approved.

Response to Notice of Violation
Inspection Report Nos. 50-280/89-24 and 50-281/89-24

Violation B

RESPONSE:

(1) Admission or Denial of Alleged Violation:

The violation is correct as stated.

(2) Reason for the Violation:

The violation was caused by personnel error. The senior reactor operator stationed at pump 1-FW-P-2 during testing on August 1, 1989 failed to closely read and properly implement the steps of Procedure 1-PT-15.1C dealing with speed control. The required method of speed control had been changed in a revision to Procedure 1-PT-15.1C dated July 25, 1989.

(3) Corrective Steps Which Have Been Taken and the Results Achieved:

Periodic Test 1-PT-15.1C was performed again on August 2, 1989. Turbine speed was adjusted in accordance with Step 5.27.5 of the procedure, and pump 1-FW-P-2 was confirmed to be fully operable.

A memorandum was included in required reading to ensure that operators were aware of changes made in the July 25, 1989 revision of 1-PT-15.1C.

The importance of pre-job briefs was stressed to operations personnel in a memorandum from the Superintendent of Operations. A pre-job brief is required for any test or evolution involving safety-related equipment or equipment important to safety. The unit SRO, the unit RO, and other personnel involved in performing the task must participate. The brief is required to include review of the applicable procedure and identification of critical tasks, such that the involved personnel understand their responsibilities, the expected response to their actions, and any emergency or contingency actions which could become necessary. Communication requirements are also required to be identified during the brief.

(4) Corrective Steps Which Will Be Taken to Avoid Further Violations:

Strict compliance to procedures has been and will continue to be station policy. The importance of procedure compliance will be stressed in continuing training programs, particularly where the operation and testing of safety-related equipment is involved. These actions are believed adequate to minimize the possibility of future occurrences of this type of violation.

(5) Date When Full Compliance Will Be Achieved:

Full compliance was achieved on August 2, 1989 when pump 1-FW-P-2 was demonstrated operable in accordance with 1-PT-15.1C.

Response to Notice of Violation
Inspection Report Nos. 50-280/89-24 and 50-281/89-24

Violation C

RESPONSE:

(1) Admission or Denial of the Alleged Violation:

The violation occurred as stated.

(2) Reason for the Violation:

The violation was due to inadequate work controls. The Electrical Maintenance department is responsible for performing Periodic Tests (PTs) of batteries according to the PT schedule issued by Engineering. During the period the late tests occurred, the PT schedule was not consistently routed to Work Planning for scheduling and inclusion in the Plan of the Day. When key electrical personnel were subject to changing work assignments and heavy outage workloads, some PTs escaped their attention as well as station management's attention until the test intervals had been exceeded.

(3) Corrective Steps Which Have Been Taken and the Results Achieved:

The electrical PT schedule is now provided to the Work Planning group on a routine basis. This ensures that PTs are correctly prioritized, scheduled and included in the Plan of the Day. In addition, daily listings of outstanding electrical PTs are routed to both the Electrical Maintenance Coordinator and the Electrical Maintenance Supervisor. These measures ensure timely scheduling and adequate management attention to PTs.

An electrical foreman is designated each month to be responsible for PTs due that month. This establishes clear accountability for the completion of PTs.

The PT schedule is discussed in morning maintenance turnover meetings to ensure that adequate manpower is allotted to PTs planned for that day.

(4) Corrective Steps Which Will Be Taken to Avoid Further Violations

The above actions will be incorporated into departmental administrative procedures to assure continued compliance.

(5) Date When Full Compliance Will Be Achieved

Full compliance will be achieved when the above corrective actions are incorporated into departmental administrative procedures. This will be accomplished by December 31, 1989.