Mr. W. Timothy Lough Special Projects Engineer State Corporation Commission Division of Energy Regulation P.O. Box 1197 Richmond, Virginia 23209

Dear Mr. Lough:

SUBJECT: SURRY, UNIT 1 - SEPTEMBER 14, 1988 OUTAGE

Your letter of October 12, 1989 stated that you were continuing your investigation of the September 14, 1988 Surry Unit 1 outage and requested responses to three questions related to that outage. Our responses to those questions are enclosed.

As stated in our August 3, 1989 response to your earlier request of July 5, 1989, from the standpoint of radiological safety, we continue to believe that the Virginia Electric and Power Company (Virginia Power, or VEPCO) acted responsibly in shutting down Surry Unit 1 because of safety concerns regarding the capability of the emergency diesel generators to mitigate the consequences of certain accident scenarios.

Sincerely,

Original signed by

Bart Buckley, Sr. Project Manager Project Directorate II-2 Division of Reactor Projects-I/II Office of Nuclear Reactor Regulation

Enclosure: As stated

cc w/enclosure: See next page DISTRIBUTION:

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*See previous concurrence

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9001050246 891227 PDR ADBCK 05000280 PNU Mr. W. Timothy Lough Special Projects Engineer State Corporation Commission Division of Energy Regulation P.O. Box 1197 Richmond, Virginia 23209

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Responses to Questions Relating to September 14, 1988 Surry Unit 1 Outage

The October 12, 1989 request referred to the underlined portion of the following paragraph excerpted from the NRC Inspection Report Nos. 50-280/89-16 and 50-281/89-16, dated September 22, 1989.

Early in the assessment period, the engineering organization had not demonstrated an adequate self-assessment capability. A specific example was the lack of administrative control for the backlog of potential problem reports which were generated in the corporate offices. Incorrect assessment of safety significance of outstanding issues was identified as a problem area. This condition became obvious when significant safety issues (i.e., emergency diesel generator sequencing problems and control room envelope air conditioning ventilation problems) were first addressed in the licensee's corrective action program approximately two years after they were identified.

Specifically, responses were requested to the following three questions as they relate to the underlined portion.

Question No. 1

o In the NRC's opinion, did Virginia Power perform a timely study of the IEIN 85-91 as it related to the Surry Power Plant?

Answer No. 1

VEPCO conducted a study of the emergency diesel generator in 1986 in response to NRC Information Notice 85-91. A design deficiency was identified as a result of this study. However, it appears that the safety significance of the deficiency was not fully appreciated until VEPCO's engineering staff had completed its evaluation of this study in 1988. While the study itself was conducted in a timely manner, subsequent followup and corrective action by VEPCO to ensure that this matter received the appropriate attention was not as timely as desirable.

Question No. 2

Did Virginia Power make a correct and timely assessment of the emergency diesel generator sequencing problems?

Once the safety significance of the issue was identified by VEPCO's engineering staff, the licensee promptly and prudently shut down Surry Unit 1 and performed the required analyses, modifications to, and testing of the emergency diesel generators. Surry Unit 2 was already shut down at the time. However, as noted in the response to Question No. 1, the delay between obtaining the initial results of the study in response to NRC Information Notice 85-91 and the evaluation by VEPCO's engineering staff of the results of the study was excessive.

Question No. 3

Was Virginia Power's corrective action (Surry Unit 1 shutdown) timely?

See response to Question No. 2