

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 21, 1990

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

Serial No. 90-329
NO/RJS R4
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. 50-280/90-07 AND 50-281/90-07

We have reviewed your Inspection Report Nos. 50-280/90-07 and 50-281/90-07 dated May 22, 1990. Our response to the Notice of Violation enclosed in the report is provided as an attachment to this letter.

We have no objection to this reply being disclosed to the public.

If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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 Maintenance Team Inspection Inspection Report Nos. 50-280/90-07 and 50-281/90-07

NRC Comment:

During the Nuclear Regulatory Commission (NRC) inspection conducted on February 26, 1990 - March 30, 1990, a violation of NRC requirements was identified. The violation involved failures to follow maintenance related procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

10 CFR 50, Appendix B, Criterion V requires activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Surry Power Station Procedure SUADM-ADM-11, currently dated 29 November 1989, "Station Drawing Revision and Distribution" requires that responsible station personnel identify, process, and implement drawing revisions as a result of design changes and identification of as built conditions and also that individuals using drawings or aperture cards of drawings ensure that the drawing was the latest revision. Surry Power Station Procedure SUADM-ADM-31, dated 5 December 1985, "Vendor Interface/Control of Vendor Documents", paragraphs 8.1.1, 8.1.2, and 8.1.3, require that the station implement applicable vendor supplied information by reviewing, tracking, and incorporating the information where necessary. Surry Power Station Procedure SUADM-M-39, dated 15 December 1989, "Control of Measuring and Test Equipment," (M&TE) paragraphs 4.3, 6.2, and 7.0, require that: safe storage and protection be provided for M&TE devices; M&TE devices not requiring calibration be so marked; and M&TE devices due for (or suspected) of requiring calibration be returned to the calibration facility for calibration, respectively.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures as evidenced by the following:

1. During the period January 1975 to the present, the licensee accomplished several quality-affecting, plant modifications of breaker capacities in 120 volt vital and semi-vital AC and DC panels that did not result in revision of eleven associated drawings.

2. On or about 12 March 1990, craft, craft supervision, and the Shift Supervisor, performed reactor protection system logic circuitry troubleshooting, procedure revision preparation, and establishment of plant condition deliberations by reference to a "For Reference Only" logic circuitry drawing without assuring the drawing was the latest revision.
3. The licensee failed to process vendor supplied information that could have affected quality work on Motor Operated Valve actuators, received from Limitorque Corporation on or about January 1990, and failed to incorporate test requirements for the overspeed trip device of the AFW Terry turbine recommended by the equipment technical manual, in accordance with applicable instructions.
4. During the period 1985 to the present, M&TE under Operations Department cognizance: were improperly stored with non-calibrated, non-M&TE equipment that permitted the damage of M&TE devices, and/or could have resulted in the use of non-calibrated equipment in safety related applications; were not properly marked as M&TE not requiring calibration because the device(s) were used with M&TE that was properly calibrated; and were not returned to the calibration laboratory for calibration when due.

This is a Severity Level IV violation (Supplement 1).

Response to Notice of Violation
Inspection Report Nos. 50-280/90-07 and 50-281/90-07

RESPONSE-PART (1)

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

The violation is correct as stated.

(2) **REASON FOR VIOLATION**

This violation occurred due to a failure to follow administrative requirements. The drawing discrepancies resulted from work performed that predated Surry's current performance improvement efforts which require positive close out of requirements as detailed in station procedures.

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

120 volt AC and DC vital and semi-vital panel breaker installations were compared against applicable drawings. The discrepancies were documented and evaluated. The as built configurations were verified to be acceptable and the affected station drawings were updated.

At the time of discovery, the applicable design control standard and station procedures contained requirements which collectively should prevent this occurrence.

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

None. Steps have previously been taken to address this issue and compliance with the present design control standard and station procedures should be sufficient to prevent further violations.

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

Full compliance has been achieved.

Response to Notice of Violation
Inspection Report Nos. 50-280/90-07 and 50-281/90-07

RESPONSE-PART (2)

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

The violation is correct as stated.

(2) **REASON FOR VIOLATION**

The violation occurred due to personnel error in not complying with existing procedural requirements. The individuals involved recognized that their action had been inconsistent with the existing requirements when questioned by the inspector who had observed the event.

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

The "For Information Only" drawings that were used were verified to be the latest revisions. The violation of procedural requirements was reviewed with I&C department personnel.

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

None. The requirement for procedural compliance has previously been added to both initial and continuing training lesson plans for station personnel as well as craft specific continuing training.

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

Full compliance has been achieved.

Response to Notice of Violation
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RESPONSE-PART (3)

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

The violation, with respect to vendor information, is correct as stated in that engineering personnel "failed to process vendor supplied information...in accordance with applicable instructions" while performing their review for applicability.

The violation also states that we "failed to incorporate test requirements for the overspeed trip device of the AFW Terry turbine recommended by the equipment technical manual, in accordance with applicable instructions." While overspeed test requirements had not yet been proceduralized, measures had been initiated to provide the capability to comply with applicable instructions. The only method for overspeeding the turbine involves manual operation of the governor linkage and is considered to be a potential safety hazard. Installation of new governors with overspeed test devices had been planned for the next refueling outage in order to safely support testing. Test procedure development had also been planned to support both post maintenance and periodic testing of the overspeed trip devices. The initial implementation date of the periodic testing was a conscious engineering decision based upon operating history, 1986 and 1988 governor inspections and maintenance, as well as post maintenance testing results. Commitment tracking system items, which identified and tracked both procedure development and overspeed trip device testing of the Terry turbines, existed and were reviewed with the NRC during the inspection. These items were to be completed during the next refueling outages currently scheduled for fourth quarter 1990 and second quarter 1991. Thus, the vendor information had been identified by the licensee and action had been initiated to implement the information.

(2) **REASON FOR VIOLATION**

The violation occurred due to lack of familiarity with the requirements for control of vendor information by MOV testing personnel. Although the technical bulletin containing the information was forwarded to corporate engineering for review and subsequent incorporation into the technical manuals, station procedures contained a requirement that the information be forwarded to station records.

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

The Station Manager issued a memo to station personnel calling their attention to the existing administrative requirement to forward vendor information to station records upon receipt.

The information provided by Limatorque has been reviewed by engineering and forwarded to station records for incorporation into the Limatorque vendor manual.

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

Affected Limatorque maintenance procedures will be updated to include applicable information.

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

Limatorque procedures will be updated by October 1990.

As an additional enhancement, the program for control of vendor information is being streamlined and strengthened as part of the implementation of the Surry Configuration Management Program.

Response to Notice of Violation
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RESPONSE-PART (4)

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

The violation is correct as stated.

(2) **REASON FOR VIOLATION**

The violation occurred due to the Operations Department having multiple "cognizant supervisors" as defined by the administrative procedure without a single supervisor assigned overall responsibility for Operation's Measuring and Test Equipment (M&TE).

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

M&TE segregated storage locations have been established to prevent damage to M&TE. Although the segregation of M&TE may prevent the use of non-calibrated M&TE in safety related applications, two way traceability for equipment used in quality work is maintained by 1) recording the equipment and its SQC number on the procedure being used, and 2) recording the date and the procedure for which the M&TE was used on the equipment's Test Equipment Record card. This traceability process precludes the use of non-calibrated M&TE in safety related applications.

The Operations Department conducted an inventory of assigned M&TE. Equipment which could not be located has been removed from the M&TE program. Since the remaining Operation's M&TE requires calibration, "Calibration Not Required" stickers were not required to be affixed.

Operators have been reinstructed to ensure that the use of M&TE is properly documented.

An Operation's section supervisor has been assigned responsibility for ensuring that Operations Department M&TE due for calibration is returned to the calibration laboratory.

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

None.

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

Full compliance has been achieved.