

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

August 22, 1990

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

Serial No. 90-467  
SPS/JWH/pmk  
Docket No.: 50-280  
License No.: DPR -32

Gentlemen:

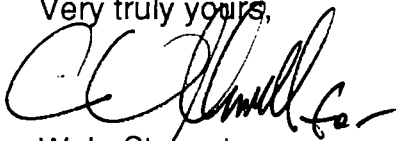
**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**REPLY TO A NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT NO. 50-280/90-21**

We have reviewed your letter dated July 23, 1990, in reference to the NRC inspection conducted from June 3, 1990 - June 30, 1990, for Surry Power Station. The inspection was reported in Inspection Report Nos. 50-280/90-21 and 50-281/90-21. Our response to the violation described in the Notice of Violation is provided in the attachment.

We have no objection to this response 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 - 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

**REPLY TO NOTICE OF VIOLATION**  
**NRC INSPECTION CONDUCTED JUNE 3, 1990 - JUNE 30, 1990**  
**INSPECTION REPORT NO. 50-280/90-21**

**NRC COMMENT:**

"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 June 2, 1990, during performance of periodic testing on the Unit 1 turbine driven auxiliary feedwater pump, operators made adjustments to the turbine speed which were not in accordance with procedure, 1-PT-15.1C, Turbine Driven Auxiliary Feedwater Pump (1-FW-P-2), dated July 25, 1989. This violation is similar to a violation which was cited in a report dated September 28, 1989.

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

**REPLY TO NOTICE OF VIOLATION**  
**INSPECTION REPORT NO. 50-280/90-21**

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

The violation is correct as stated, with the exception that the procedure in use, 1-PT-15.1C, was dated May 10, 1990.

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

The violation was caused by a failure to follow procedures on the part of the Assistant Shift Supervisor in charge of the test. The Assistant Shift Supervisor adjusted the speed of the auxiliary feedwater (AFW) pump turbine from its as-found value of 4145 RPM to 4200 RPM. This is contrary to Procedure 1-PT-15.1C. The procedure does not require turbine adjustment unless the as-found pump shaft speed exceeds 4250 RPM. Another operator present for the test questioned if this adjustment was consistent with the procedure, but did not object to the action taken by the Assistant Shift Supervisor to adjust the speed. The Assistant Shift Supervisor resigned from Virginia Power Company on June 4, 1990, and was not available for detailed discussions as to the reason for his actions.

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

The as found and as left conditions of the AFW pump were evaluated by Engineering, and the pump was determined to be operable. This determination was based on previous test results which showed that, when the pump is operated at 4200 RPM, the pump head falls within the acceptable range and the turbine does not trip on overspeed when started.

The Station Manager issued a memorandum to station supervision stressing the need for strict adherence to procedures and the need for the proper understanding of the procedural steps prior to implementation.

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

Although similar to a September, 1989 event, this violation is considered to be an isolated event without programmatic implications. Therefore, no additional corrective action beyond those taken for the September, 1989 event are deemed necessary.

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

Full compliance was achieved on June 12, 1990 when the turbine-driven AFW pump was confirmed to be operable despite the turbine speed adjustment.