VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 13, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No. 91-235
SPS/RCB
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. 50-280/91-06 AND 50-281/91-06

We have reviewed your Inspection Report Nos. 50-280/91-06 and 50-281/91-06 dated April 12, 1991. Our reply to the Notice of Violation enclosed in the report is provided as an attachment to this letter.

The Inspection Report expressed your concern that corrective actions we implemented in 1990 to preclude repetition of missed surveillance tests appeared to have been inadequate. We share this concern and have a high sensitivity to the need for timely completion of surveillances. When we identified these recent events to you, we undertook a review of our program and have initiated actions to further strengthen our administrative controls in this area. Specific actions underway are provided in the attached reply. In addition, we are conducting an integrated performance-based assessment of the surveillance program by our Corporate Nuclear Safety and Quality Assurance groups. The assessment will address the issue of missed surveillance at both Surry and North Anna and provide root cause recommendations to both station and corporate management. Management overview of surveillance will be ongoing.

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

Very truly yours,

W. L. Stewart
Senior Vice President Nuclear

Attachment

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PDR ADOCK 05000280
Q PDR

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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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-280/91-06 AND 50-281/91-06

NRC Comment:

During an NRC inspection conducted on February 24 - March 30, 1991, 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 (1990), the violation is listed below:

> 10 CFR 50, Appendix B, Criterion XVI and the licensee's Quality Assurance Program (VEP 1-5A, Section 17.2.16) collectively state, in part, that measures shall be established to ensure that conditions adverse to quality are promptly identified and corrected and that, in the case of significant conditions adverse to quality, the measures shall assure that the corrective action taken precludes repetition.
>
> Contrary to the above, the corrective actions implemented throughout 1990 to preclude repetition of untimely periodic surveillance performances were inadequate, in that, in March 1991, two additional periodic surveillances, 2-PT-18.6I and PT-53.3, were identified as not performed within the Technical Specification periodicity requirements.

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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-280/91-06 AND 50-281/91-06

(1) Admission or Denial of the Alleged Violation

The violation is correct as stated. Both events were self-identified and documented by the station's corrective action system and reported in Licensee Event Reports pursuant to 10CFR50.73.

(2) The Reason for the Violation, or, if Contested, the Basis for Disputing the Violation

The reason for the violation was personnel error. As stated in the Notice of Violation, corrective actions implemented throughout 1990 failed to provide for the timely performance of two performance tests (PTs) during March of 1991. In one case, a new PT procedure was issued and not added to the responsible department's schedule. In the second instance, the responsible department had not established a formal internal system which would adequately track PT accomplishment. The periodic reports issued by Engineering Testing, the department responsible for scheduling and tracking PT performance, did not effectively alert the responsible departments.

(3) The Corrective Steps That Have Been Taken to Avoid Further Violations

A task team was formed to review these and similar events. As a result, a number of corrective actions have been identified which are described below.

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

The following corrective actions are being implemented:

- In the event that a new PT is issued or a schedule is changed, Engineering Testing will provide the necessary documentation to the responsible user group and written acknowledgement of receipt will be required.

- Each user group is being required to establish an individual to serve as a point of contact with the Engineering Testing Group for the surveillance test program. By assigning individuals such responsibility at the working level, we believe that communications and accountability will be improved amongst the various station groups.

- User groups are reviewing their internal administrative practices for scheduling and tracking surveillances and taking appropriate actions to strengthen their internal administrative controls. These controls will include preparation of a monthly schedule using the data package provided by Engineering Testing.

- Once per week, Engineering Testing will issue a report which will identify required testing within the next nine days. This listing will serve two purposes:

  - serve as a reminder to user departments of surveillance tests that are coming due.

  - reflect tests which may require more frequent performance because of operability concerns (e.g., equipment being placed in"Alert").

- Upon completion of a surveillance test, Engineering Testing will be expeditiously notified by the user department either formally or informally. This prompt notification will eliminate the "dead time" between a test's completion and the transmittal of the official test documentation for Engineering Testing to close the item. This should provide a more timely update of the status of outstanding testing.

- The surveillance testing schedule will be reviewed regularly to verify completion of required tests. Any test indicated as due which has not been reported as complete will result in the responsible department being contacted for clarification, resolution and documentation.

- The status of the surveillance testing program will be reviewed with station management at the regularly scheduled morning staff meetings.

- Corporate Nuclear Safety and Quality Assurance Departments will perform an integrated performance-based assessment of the station's surveillance testing program in the near future.

(5) <u>The Date When Full Compliance Will Be Achieved</u>

Full compliance will be achieved by June 1, 1991. Recommendations resulting from the corporate assessment will be evaluated, and additional corrective actions will be taken to further enhance the program as appropriate.