

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 16, 1991

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

Serial No.: 91-567
SPS/RCB/ETS
Docket Nos.: 50-280
50-281
License Nos.: DPR-32
DPR-37

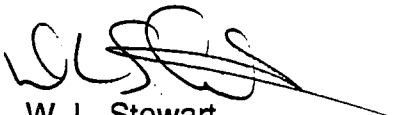
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/91-20
AND 50-281/91-20

We have reviewed your Inspection Report Nos. 50-280/91-20 and 50-281/91-20 dated September 20, 1991. Our reply to the Notice of Violation is attached.

We have no objection to this correspondence being made a matter of public record. 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. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station

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PDR ADCK 05000280
Q PDR

JED

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED JULY 8-12, 1991
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/91-20 AND 50-281/91-20

NRC COMMENT:

"During a NRC inspection conducted on July 8-12, 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 (1991), the violation is listed below:

Technical Specification 4.10B requires that during periods of power operation at greater than 10 percent of rated power, the hot channel factors of Technical Specification 3.12 shall be determined during every effective full power month. Technical Specification 4.0.2 allows a 25 percent tolerance on surveillance intervals.

Contrary to the above, while operating at greater than 10 percent of rated power, the interval between surveillances of hot channel factors of Unit 2, between July 18, 1990 and September 4, 1990, was 1.44 effective full power months. Consequently, the determination of continued core operability was delayed beyond the maximum allowed 1.25 effective full power months.

This is a severity level IV violation (Supplement I)."

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REASON FOR THE VIOLATION, OR, IF CONTESTED, THE BASIS FOR DISPUTING THE VIOLATION

The violation is correct as stated. This example of exceeding the required surveillance interval occurred and was identified prior to modifying our program controls for surveillance test scheduling. The violation occurred due to our original interpretation of the Technical Specification surveillance interval and application of the associated grace period.

In a February, 1991, telephone conference call between the NCR regional and headquarters staffs and Virginia Electric and Power Company management, the NRC provided the interpretation on the implementation of the surveillance interval and the associated grace period. At that time we took prompt action to modify the programmatic controls in the surveillance area to satisfy the interpretation.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

To assure compliance with TS 4.0.2, surveillance intervals and grace period, The station's method for scheduling tests was modified on February 1, 1991. Because of the complexity of the test program, schedule deviations are authorized, but are strictly controlled. In order to assure that the maximum permissible interval is not exceeded, an administrative grace period of minus (-) 0%, plus (+) 25% has been imposed (TS allowed grace period is $\pm 25\%$). Also, the testing interval has been strictly defined, e.g., "weekly" - at least every seven days (+1 day), "monthly" - at least every 31 days (+7 days), etc. These administrative limits preclude any interpretation of the allowed grace period which would permit performing consecutive tests early in one grace period and late in the next.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No additional corrective steps are necessary.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.