

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry Unit 1

Docket No. 50-280
License No. DPR-32

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 8 through April 4, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violations are listed below:

- A. Technical Specifications (TS) 3.10.A.1 requires that for those systems which provide a direct path from containment atmosphere to the outside atmosphere, at least one valve shall be closed in each line penetrating the containment during refueling operations.

TS 6.4.D requires that refueling procedures be followed.

Procedure 1-OP-16, Refueling Containment Integrity and Reactor Coolant System Mid-Loop Containment Closure Checklist, dated March 19, 1992, requires that temporary flanges used to meet containment integrity be sealed with gaskets so that there are no visible air gaps.

Contrary to the above, direct paths from containment atmosphere to the outside atmosphere existed during refueling operations under the following conditions:

The removal of core internals and core off-load that commenced at 5:42 p.m. on March 17, 1992 and completed at 7:19 p.m. on March 20, 1992, was conducted while a direct path existed via an opening inside containment from feedwater (FW) header drain valve 1-FW-9 through the A steam generator (SG) and out an improperly sealed blank covering a maintenance opening on the bonnet of the A main steam (MS) trip valve 1-MS-TV-101A.

The movement of fuel associated with core on-load from 2:17 p.m. to 3:01 p.m. on April 2, 1992, was conducted while a direct path existed via an opening inside containment at the hand hole on the B SG through the B MS line and out through an improperly sealed blank covering a maintenance opening on the bonnet of MS check valve, 1-MS-117. Additionally, during this period, the same direct path existed as described above.

This is a Severity Level IV violation (Supplement I)

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by the licensee's Topical Report, VEP 1-5A, requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures. These procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, maintenance and modification activities affecting quality were not being accomplished according to steps in various sections of DCP no. 90-26-1, Heat Exchanger Service Water Piping Cleaning and Recoating of Surry/Unit 1, dated October 2, 1990, which required in part the removal of temporary lighting, tools, debris, and other equipment from the service water lines. Failure to follow these instructions became apparent when a rain suit was found in the service water side of the B recirculation spray heat exchanger.

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

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the

violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this ~~27th~~ day of April 1992