

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

July 31, 1992

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

Serial No. 92-454
SPS/VAS/ETSR7
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. 50-280/92-13 AND 50-281/92-13

We have reviewed your Inspection Report Nos. 50-280/92-13 and 50-281/92-13 dated July 1, 1992, and the enclosed Notice of Violation. Our reply to the Notice of Violation is attached. While we agree that safety evaluations were not performed for certain evolutions within the procedures referenced in the violation, the specific procedure revisions cited had been appropriately screened to identify changes as required by 10 CFR 50.59. None of the specific changes made by the revisions constituted changes as described in 10 CFR 50.59. However, safety evaluations have subsequently been prepared for each of the three original procedures. As the result of the evaluation for one example (2-OP-49.7), additional procedural controls are being implemented for both units.

In Paragraph 7b of the Inspection Report, the inspectors concluded that the Updated Final Safety Analysis Report (UFSAR) description of system alignment or configuration constitutes a procedure. The report further states that a procedure that aligns the system differently from the UFSAR description constitutes a change requiring a safety evaluation. We disagree with such a rigid interpretation of UFSAR system descriptions. The UFSAR description may include certain operating procedural details. However, to fully define operational configurations these system descriptions and the system layout drawings must be evaluated in concert with associated operating and maintenance procedures. We request that this apparent difference in interpretation be the subject of future discussion with the NRC Staff, such as during the next scheduled counterparts meeting.

We are committed to a technical procedures upgrade program (TPUP). The examples cited are procedures that have not been upgraded pursuant to the current requirements of this program. The development of each upgraded procedure involves a detailed review including a review of the UFSAR to determine if the evolution involves a change

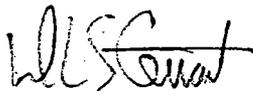
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to the UFSAR. When the 10 CFR 50.59 Activity Screening identifies a change, a document search is completed to identify the previous safety evaluation(s). If the required safety evaluation cannot be found, one is prepared.

Please contact us if you have any questions or require additional information.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Mr. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED May 10 - June 6, 1992
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/92-13 AND 50-281/92-13

NRC COMMENT:

"During the NRC inspection conducted on May 10 through June 6, 1992, 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 50.59 (b) (1) requires, in part, that records of changes in procedures as described in the safety analysis report include written safety evaluations which provide the basis for the determination that the procedure changes do not involve unreviewed safety questions.

Contrary to the above, written safety evaluations were not performed for procedures that operated plant systems differently than described in the Updated Final Safety Analysis Report. Examples of such procedures were: OP 52.2.1, Administrative Control of 1-FP-36, dated October 27, 1989; 2-OP-49.7, Filling and Draining RSHX Service Water Supply Piping, dated September 18, 1991; and OP 6.2.3, Administrative Control of 1-EG-15, 2-EG-15 or 3-EG-15, dated January 20, 1990.

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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED MAY 10 - JUNE 6, 1992
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/92-13 AND 50-281/92-13

Reason for the Violation, or, if Contested, the Basis for Disputing the Violation

For the examples cited in the violation, the changes to the specific revisions of the procedures were appropriately reviewed, in accordance with 10 CFR 50.59. However, the violation appears to be directed at the thoroughness of the original 10 CFR 50.59 evaluation performed for these procedures. Based on our review, we agree that the 10 CFR 50.59 documentation for the original procedures were inadequate.

Each of the three procedure revisions cited in the violation included an adequate activity screening checklist performed pursuant to our 10 CFR 50.59 safety analysis program as described in VPAP-3001 "Safety Evaluations." This checklist documents the review of changes to determine when a detailed safety evaluation is necessary pursuant to 10 CFR 50.59. It is our position that 10 CFR 50.59 requires that only the impact of the specific change to an approved procedure be evaluated. The screening criteria are an effective method to identify the need for a detailed safety evaluation.

The lack of thorough safety evaluations for procedures is a procedure quality issue. The corrective action for a 1988 violation on procedure quality committed to the Technical Procedures Upgrade Program (TPUP). The TPUP is programmatically addressing the technical adequacy and the supporting documentation for each procedure. These procedures are scheduled to be upgraded pursuant to TPUP schedules.

Corrective Steps Which Have Been Taken and the Results Achieved

For each of the referenced procedures, a detailed safety analysis has been performed on the original procedure pursuant to our 10 CFR 50.59 program which is controlled by VPAP-3001. For procedure 2-OP-49.7, the safety analysis determined that additional procedural controls were appropriate. The recommended controls specified by the 10 CFR 50.59 safety analysis have been implemented. These safety evaluations will be reported to the NRC in the Surry monthly operating report. Procedurally controlled evolutions, including those involving administrative control, are being reviewed pursuant to the TPUP priorities. The TPUP includes a document search and 10 CFR 50.59 screening to verify operation(s) in a procedure are consistent with the description of the plant in the UFSAR. If the screening identifies a change pursuant to 10 CFR 50.59 and a safety evaluation for the specific change cannot be located, one is prepared.

The current Safety Analysis Activity Screening Checklist is prepared according to VPAP-3001 and contains adequate questions to determine if a full safety analysis is needed. The checklist does not specifically require a safety analysis for administratively controlled activities. It does require a safety analysis be written when there is a change or modification to the facility or methods of operation listed in the UFSAR.

Corrective Steps Which Will be Taken to Avoid Further Violations

An assessment of the safety evaluation process was conducted to evaluate the implementation and the effectiveness of the program described in VPAP-3001. On March 30, 1992, the assessment team concluded that the safety evaluation program defined in VPAP-3001 meets the intent of 10 CFR 50.59. The assessment team concluded that the activity screening and safety evaluation program are being implemented adequately for procedure modifications.

The assessment team identified areas where enhancements to the process would provide added assurance of compliance. Specifically, VPAP-3001 and associated implementing procedures will be revised to more clearly identify the change activities that are required to be included in the activity screening and safety evaluation program. Enhancements to the training program for activity screeners are being planned to provide added emphasis on what constitutes a change.

The 10 CFR 50.59 and continuing technical training programs will be modified to emphasize the need for increased sensitivity to the UFSAR descriptions, when performing both safety evaluation and activity screening checklists.

The Date When Full Compliance Will be Achieved

The preparation of safety evaluations for station technical procedures is being addressed programmatically by the TPUP program which is scheduled to be completed in December 1996.

Full compliance for the cited examples was achieved when the 10 CFR 50.59 safety analyses were prepared and the recommended controls, identified by the safety analysis for 2-OP-49.7, were established. Procedure revisions to implement the controls will be implemented by August 21, 1992.