

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 26, 1978

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II - Suite 818
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

Serial No. 407/071278
PO&M/DLB:das
Docket Nos: 50-280
50-281
License Nos: DPR-32
DPR-37


Dear Mr. O'Reilly:

This is in response to your letter of July 12, 1978 in reference to the inspection conducted at Surry Power Station on May 16-19, 22-26 and June 21-23, 1978 and reported in IE Inspection Report Nos. 50-280/78-16 and 50-281/78-16.

We have reviewed your letter and the enclosed inspection reports. Our response is contained in the attachment to this letter.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company interposes no objection to these inspection reports being made a matter of public disclosure.

Very truly yours,


C. M. Stallings
Vice President - Power Supply
and Production Operations

Attachment

cc: Mr. Albert Schwencer ✓

(2) Continued,

| <u>DESCRIPTION</u> | <u>PURPOSE</u> |
|--|---|
| Administrative Procedure No. 45 - Suggestions | Provides vehicle to suggest improvements in procedures, methods, and safety. |
| Corporate Policy Statement | Relates VEPCO's policy to excellence. |
| Policy Statement | Describes open door policy and lists phone numbers to call in the event a safety situation is not rectified. |
| 10 CFR 21 | Describes reporting requirements upon discovery of any deficiency or non-compliance contrary to nuclear safety. |
| Notice to Employees | The phone numbers in NRC to call if a problem cannot be resolved at the station. |

In addition, the following actions were taken:

- (a) Establishment of a program to improve access to snubbers on both units.
- (b) Post all minutes of the Station Nuclear Safety and Operating Committee meetings for two weeks.
- (c) Appointed individual to provide feedback to non-supervisory employees who have submitted documents pointing out problems or suggestions.
- (d) A similar program is currently being conducted at our North Anna Facility.

(3) Review of safety issues by appropriate levels of management commensurate with the importance of the issues.

Many avenues are available to employees to report safety problems. The most effective are those prescribed in Administrative Procedure 44, Employee Safety. This procedure established an Employee Safety Committee made up of a representative from each department. This committee receives all reports of safety hazards from station employees and attempts to rectify them. If the committee is unable to rectify the problem, they forward them to Station Management for resolution. Station Management then takes appropriate action to resolve the problem. Reports of significant safety hazards that present a serious and imminent threat to station employees are brought to the attention of all employees and station management immediately. Station Management reacts immediately to those problems and resolves them on the same day as reported.

RESPONSE TO INFRACTIONS LISTED
IN NRC REGION II INSPECTION REPORT
78-16 OF JULY 12, 1978

NRC COMMENT:

- A. Criterion XVII of Appendix B to 10 CFR 50 as implemented by the Vepco Nuclear Power Station Quality Assurance Manual, Section 11.5.3.4 and form 888.85, Periodic Test Critique, requires, in part, that inspection and test records shall as a minimum identify the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to the above, the failure of hydraulic suppressors on Unit 2 to meet the fluid level acceptance criteria during the performance of visual inspection of hydraulic shock suppressors in April 1978 and the corrective actions taken in connection with these deficiencies were not documented in the test results record or in Periodic Test Procedure No. 39, dated April 7, 1978.

This is an infraction (Unit 2).

VEPCO RESPONSE:

This infraction is correct as stated.

1. Corrective steps taken and results achieved.

The error in documentation of the results of the inspection is attributed to the fact that the wording of the inspection procedure permitted inspector to exercise broad latitude in determining operability. The following changes have been made to the procedural aspects of the inspection:

- (1) Procedure changed to delineate specific inspection criteria requiring the inspector to identify only a "Pass-Fail" for each inspection item for each snubber.
- (2) Division of inspection procedures into "AS FOUND" for the end of the inspection interval and "AS LEFT" for the beginning of the inspection interval with unique inspection criteria for each.
- (3) Provisions for independent evaluation of snubber inspection results to determine and document "operability".

Inspections conducted under the new procedure have achieved the intended results of providing timely and proper evaluation of snubber deficiencies and timely notification to management of status of snubbers.

- (4) The revised Periodic Test requires QC participation.

VEPCO RESPONSE: (Continued)

Infraction A.

2. Corrective steps to be taken to avoid further non-compliance:

In that inspections conducted under the new procedures are achieving the results intended, no further corrective steps are anticipated.

3. Date when full compliance will be achieved:

As noted above, the revised inspection procedure is achieving the necessary results, therefore, full compliance in this area has been achieved.

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RESPONSES TO INFRACTIONS LISTED
IN NRC REGION II INSPECTION REPORT
78-16 OF JULY 12, 1978

NRC COMMENT:

- B. Technical Specification 4.17A requires that a visual inspection be performed within 31 days + 25% (7 days) when eight or more hydraulic suppressors are identified as inoperable.

Contrary to the above, a visual inspection of Unit 2 hydraulic suppressors was not performed until approximately 48 days after 26 of the suppressors failed to meet the fluid level acceptance criteria specified in Periodic Test 39. This is an infraction (Unit 1).

VEPCO RESPONSE:

The infraction is correct as stated.

1. Corrective steps taken and results achieved:

This infraction is related to Infraction A stated above, in that management response in setting the inspection interval was based on the documentation of the inspection. The procedure changes described in the response to Infraction A have also served to provide management with the information necessary to direct operations. Inspections and evaluations under the revised procedure have served to inform management of the inspection result so that current inspection intervals are considered correct and proper.

2. Corrective steps taken to avoid further non-compliance:

The revised procedures now in use are providing the required results. No further corrective measures are anticipated.

3. Date when full compliance will be achieved:

Full compliance is now being achieved.

RESPONSES TO INFRACTIONS LISTED
IN NRC REGION II INSPECTION REPORT
78-16 OF JULY 12, 1978

NRC COMMENT:

- C. Technical Specification 6.6.2.b.(2) requires that a written report be submitted to the Director of the appropriate NRC Regional Office within thirty days when conditions leading to operation in a degraded mode permitted by a limiting condition for operation are identified.

Contrary to the above, two operable hydraulic shock suppressors identified on Unit 2 during the performance of Periodic Test 39 on April 7, 1978, were not reported to the NRC.

This is an infraction (Unit 2).

VEPCO RESPONSE:

The infraction is correct as stated.

1. Corrective steps taken and results achieved:

The inspection procedure has been revised to require that inoperable snubbers are identified for reporting as items leading to operation in a degraded mode and therefore reportable in accordance with Technical Specification 6.6.2.b.(2). The intended results have been achieved.

2. Corrective steps taken to avoid further non-compliance:

Actions taken in revision of the procedures have achieved the desired result. No further action is necessary.

3. Date when full compliance is achieved:

Full compliance has been achieved.

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RESPONSES TO INFRACTIONS NOTED
IN NRC REGION II INSPECTION REPORT
78-16 OF JULY 12, 1978

NRC COMMENT:

- D. Technical Specifications 6.1.C.1.e.4 and 6.1.C.1.e.7 specify that the Station Nuclear Safety and Operating Committee shall review all proposed modifications to systems which would constitute a design change and that the committee determine whether or not the proposed modifications involve an unreviewed safety question.

Contrary to the above, two eight-inch containment isolation valve discs (MOV-CS-101A and MOV-CS-101B) on Unit 1 were modified in May 1978, a groove approximately 2 inches deep was cut radially in each disc, without prior committee review.

This is an infraction (Unit 1).

VEPCO RESPONSE:

The infraction is correct as stated.

1. Corrective steps taken and results achieved:

Since the condition was identified with the unit in a cold shutdown condition, the full review of outage maintenance activity had not been completed. Questions, other than those from the NRC inspection team, remained unanswered as to the acceptability of the valve discs and they were changed out for new discs of the unaltered configuration. The affected valves were satisfactorily leak tested with the new discs.

2. Corrective steps taken to avoid further non-compliance:

Station personnel responsible for repair and maintenance activities have been reinstructed on the limitations of scope of work that may be performed as maintenance action.

3. Date when Full Compliance will be achieved:

Full compliance has been achieved.

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RESPONSES TO INFRACTIONS LISTED
IN NRC REGION II INSPECTION REPORT
78-16 OF JULY 12, 1978

NRC COMMENT:

- E. Technical Specification 6.4.A. and D requires that procedures for testing and corrective maintenance shall be followed.

Contrary to the above, Periodic Test 16.4, Containment Isolation Valve Leakage, and MMP-C-C-001, Corrective Maintenance for Valves in General, were not followed in that foreign substances such as beeswax and grease were utilized as valve disc lubricants on valves MOV-CS-210C and D, RS256A, RS156B, and VP-12. Additionally, an evaluation was not performed to determine the effect that the foreign substance would have on the valve leakage test results.

This is an infraction (Units 1 and 2).

VEPCO RESPONSE:

The infraction is correct as stated.

1. Corrective steps taken and results achieved:

On May 30th, an Administrative memorandum was issued which prohibited the use of foreign materials in valves whose leak tightness is demonstrated in the performance of PT-16.4. In addition, on June 1st a change to MMP-C-G-001 was approved which required as the last step prior to close out, "an inspection for internal acceptability, i.e. intervals of integrity, cleanliness, foreign material, etc." Q.C. witness of the close out was also added in the procedure change.

Further action taken to insure the current unit operation is not hazarded by any effect was to conduct an in depth evaluation of all valves tested under 10 CFR 50, Appendix J to determine that the valves meet containment leakage acceptance criteria with the assistance of any foreign substance. Valves which could not be determined with a high degree of confidence to be free of foreign material were opened, inspected and re-closed using the procedure change as described above. In addition, leakage tests of selected valves were made to determine the affect of lubricating substances. Further evaluation of lubricants is anticipated.

2. Corrective steps to be taken to avoid further non-compliance:

Procedure changes will be initiated to incorporate additional information as it is received regarding the use of approved lubricants for valve seat and disc protection.

3. Date when full compliance will be achieved.

Full compliance has been achieved.

RESPONSES TO INFRACTIONS LISTED
IN NRC REGION II INSPECTION REPORT
78-16 OF JULY 12, 1978

NRC COMMENT:

- F. Criterion XVI (corrective action) of 10 CFR 50 Appendix B requires, in part, that the identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented. Section 17.2.16 of VEP-1-A, Quality Assurance Program Topical Report, requires that corrective maintenance of nuclear safety related material be documented on a maintenance report. Section 16 of the Nuclear Power Station Quality Assurance Manual (NPSQAM) requires in paragraph 6.5.4.d that maintenance procedures include provisions for the signature of the individual completing the work.

Contrary to the above, the provisions of the NPSQAM were not followed in that certain safety related maintenance actions on Units 1 and 2 were completed by individuals other than those executing the documentation in the maintenance procedure or maintenance report. Examples include maintenance reports issued in April 1978 that involved maintenance of the Emergency Diesel Generator No. 1, Repair of Fuel Cooling Pump FC-P-3B; and performance of Periodic Test Procedure No. 39 on Unit 2 snubbers.

This item is an infraction (Units 1 and 2).

VEPCO RESPONSE:

The infraction is correct as stated.

1. Corrective steps taken and results achieved.

Maintenance personnel have been re-instructed to emphasize the proper handling of procedures. Emphasis was placed on proper methods of completing procedures, (i.e. the craftsmen must sign the steps he performs). Also, emphasis was placed on proper documentation and routing for steps requiring procedure deviations.

2. Corrective steps taken to avoid further non-compliance:

No further action is necessary.

3. Date when full compliance is achieved.

Full compliance has been achieved.