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MAY 10 1982

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Docket No. 50-280  
License No. DPR-32  
EA 82-58

Virginia Electric and Power Company  
ATTN: Mr. R. H. Leasburg, Vice President  
Nuclear Operations  
P. O. Box 26666  
Richmond, VA 23261

Gentlemen:

A special inspection was conducted by the NRC Region II staff on February 23 and 24, 1982 at the Surry Power Station to evaluate the regulatory significance of operation of Unit 1 under conditions exceeding limiting conditions for operation (LCO) without having met the action statement. The inspection findings indicate that there was a violation associated with this event. NRC concerns relating to the violation were discussed between Virginia Electric and Power Company management personnel and NRC staff members at an enforcement conference held at the Surry Power Station on March 25, 1982.

On or about February 21, 1982, when Unit 1 was shutdown, a technician removed fuses from three of six instruments monitoring high steam flow in the main steamlines. This was done without the knowledge and approval of the Shift Supervisor as was required by your plant procedures. The reactor was brought to power with two inoperative instruments in the "A" main steamline and one inoperative instrument in the "B" main steamline. Some ten hours later the inoperability of the instruments was recognized and the fuses were replaced.

This violation of Technical Specifications was similar to one that occurred in August 1980. At that time, a technician failed to document removal of six fuses in instrumentation measuring high steam flow on Unit 2. More recently, in December 1981, Unit 2 was operated with one inoperable steam flow instrument in each of the A and B main steamlines because of misaligned valves. These recurrent violations indicate a common and basic cause which requires identification and correction.

In order to emphasize the need for Virginia Electric and Power Company to achieve an effective program to ensure proper system alignment and operator awareness of inoperable systems, the NRC proposes to impose a civil penalty of fifty thousand dollars for the item identified in the enclosed Appendix, "Notice of Violation and Proposed Imposition of Civil Penalties," which has been categorized at the severity level described in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C) published in the Federal Register, 47 FR 9987 (March 9, 1982). The base penalty of forty thousand dollars was increased by twenty-five percent

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Virginia Electric and Power  
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as provided by the policy because you could reasonably have been expected to have taken preventive measures to preclude the occurrence of a violation of this nature at this facility following a similar violation in August 1980 at Unit 2.

You are required to respond to the Appendix, and in preparing your response you should follow the instructions specified in the Appendix. In particular, please describe those management controls you have instituted or plan to institute for preventing the repetition of violations of this type. Your response will be the basis for determining whether additional enforcement actions are warranted.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC's Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original Signed By  
R. C. DeYoung

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Enclosure:  
Appendix - Notice of Violation and  
Proposed Imposition of Civil Penalties

previously concurred  
see attached

WPU:CY	ES:IE	ELD	RII	D:ES:IE	DD:IE	D:IE
5520	GBarber	RHoefling		JLieberman	JSniezek	RDeYoung
4/29/82	5/3 /82	4/30/82	4/ 3082	5/ 3/82	5/ 5/82	5/ 5/82

Virginia Electric and Power  
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- 2 -

percent as provided by the policy because you could reasonably have been expected to have taken preventive measures to preclude the occurrence of a violation of this nature at this facility following a similar violation in August 1980 at Unit 2.

You are required to respond to the Appendix, and in preparing your response you should follow the instructions specified in the Appendix. In particular, please describe those management controls you have instituted or plan to institute for preventing the repetition of violations of this type. Your response will be the basis for determining whether additional enforcement actions are warranted.

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Sincerely,

**\*Original Signed By  
R. C. DeYoung\***

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Enclosure:  
Appendix - Notice of Violation and  
Proposed Imposition of Civil Penalties

WPU:CY  
5520  
4/29/82

ES:IE  
GBarber  
5/3/82

*By phone*  
ELD  
RHoeffling  
4/30/82

*By phone*  
RI  
4/30/82

*H*  
D:ES:IE  
JLieberman  
5/3/82

*W*  
DE:IE  
JSniezek  
5/5/82

D:IE  
RDeYoung  
5/5/82

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Virginia Electric and Power  
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State Corporation Comm.  
Jefferson Bldg.  
Richmond, VA 23219

Gerald Baliles, Atty. Gen.  
Supreme Court Bldg.  
Richmond, VA 23219

APPENDIX  
NOTICE OF VIOLATION  
AND  
PROPOSED IMPOSITION OF CIVIL PENALTIES

Virginia Electric and Power Company  
Surry Power Station Unit 1

Docket No. 50-280  
License No. DPR-32  
EA 82-58

Between 4:00 p.m. on February 21 and 2:45 a.m. on February 22, 1982, Unit 1 operated with three of six high steam flow measurement instruments inoperable. This resulted in one of three main steamlines being unmonitored and the loss of redundancy on a second main steamline. Under these circumstances, Technical Specification limiting conditions for operations (LCO) called for shutdown of the reactor. Operation in this degraded safety condition was caused by failure of a technician to secure approval of the Shift Supervisor as was required by plant procedures. The reactor operator became aware of the LCO violation when an instrument technician informed the control room that he had three main steamline instrument fuses to install. The fuses were installed immediately.

The facts surrounding this event were the subject of a special inspection conducted by Region II at the Surry Power Station on February 22 and 23, 1982. NRC concerns regarding the violation disclosed during the inspection were discussed with Virginia Electric and Power Company management personnel on March 25, 1982 during an enforcement conference at the Surry Power Station.

This event is similar to one which occurred in August 1980. At that time a technician failed to document his removal of the six electric fuses on the high steam flow instruments of Unit 2. Recurrence of similar violations indicates failure to identify and correct basic flaws in a safety program and are of particular concern to the NRC.

In order to emphasize the need for Virginia Electric and Power Company to achieve an effective program to ensure proper system alignment and operator awareness of inoperable systems, the NRC proposes to impose a civil penalty of fifty thousand dollars for this matter. The basic penalty for a violation of the severity level of this event is \$40,000, as determined from Tables 1A and 1B of the NRC Enforcement Policy (10 CFR Part 2, Appendix C) 47 FR 9987 (March 9, 1982). The base civil penalty was increased by 25 percent in accordance with the NRC Enforcement Policy because you could reasonably have been expected to have taken preventive measures to preclude the occurrence of a violation of this nature following a similar violation in August 1980 at Unit 2. In accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C) 47 FR 9987 (March 9, 1982), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the particular violation and its associated penalty is set forth below:

~~Docket 8206302189~~

Technical Specification 6.4.D requires the licensee to follow procedures established in compliance with Technical Specification 6.4.A. Procedure 5.2 of Section 14 of the Quality Assurance Manual was established to implement 6.4.A. Paragraph 5.2.2 of this procedure requires that jumpers not controlled by an approved procedure shall not be used anywhere in the station without the Shift Supervisor's prior knowledge and approval.

Technical Specification 3.7.B requires the licensee to have an operable high steam flow channel in each main steamline when the reactor coolant system temperature is above 543°F.

Contrary to the above, on February 21, 1982 the licensee did not implement procedure 5.2 of Section 14 of the approved Quality Assurance Manual in that fuses were pulled without the benefit of an approved procedure and without the knowledge and approval of the Shift Supervisor. Jumpers as used in this procedure include, but are not limited to electrical lifted leads. In this instance, the removal of fuses is considered the equivalent of lifting electrical leads. As a consequence, Unit 1 was operated, between 4:00 p.m. on February 21 and 2:45 a.m. on February 22, without an operable high steam flow channel in "A" main steamline when the reactor coolant system temperature was above 543°F.

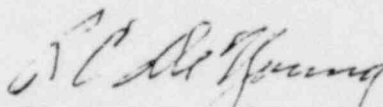
This is a Severity Level III Violation (Supplement I)  
(Civil Penalty - \$50,000)

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including for each violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, Virginia Electric and Power Company may pay the civil penalty of fifty thousand dollars or may protest imposition of the civil penalty in whole or in part by a written answer. Should Virginia Electric and Power Company fail to answer within the time specified, this office will issue an order imposing the civil penalty in the amount proposed above. Should Virginia Electric and Power Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, such answer may: (1) deny the violations listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty. In requesting mitigation of the proposed penalty, the five factors contained in Section IV(B) of 10 CFR Part 2, Appendix C should be addressed.

Upon failure to pay any civil penalty due, which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General of the United States, and the penalty unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Dated at Bethesda, Maryland  
this 10 day of May 1982