

June 9, 1982

USNRC REGION II
ATLANTA, GEORGIA

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DESIGNATED ORIGINAL

Certified By

Thomas H. Leasburg

United States Nuclear Regulatory Commission
Attn: Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
Washington, D.C. 20555

Serial No. 301
NO/RMT:acm
Docket No. 50-280
License No. DPR-32

Gentlemen:

We have reviewed your letter of May 10, 1982 in reference to the inspection conducted at Surry Power Station on February 23 and 24, 1982 and reported in IE Inspection Report No. EA 82-58. Our response to the specific infraction is attached.

While we accept full responsibility for this incident, we believe further consideration should be given by the NRC to the following two items.

- (1) This incident was discovered and promptly reported by VEPCO.
- (2) The NRC agreed with our earlier actions regarding the August, 1980 incident which caused a 25 percent increase in the civil penalty. The preventive measures implemented as a result of that incident were prudent measures and could be reasonably expected to prevent items in the future. The preventive measures were vigorously implemented.

We believe the above two items, properly considered by the NRC should cause remission or mitigation of the penalty. We would be pleased to discuss this further if necessary.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

R. H. Leasburg

R. H. Leasburg

Enclosures

1. Response to Notice of Violation
2. Voucher Check No. 28825 in payment of Civil Penalty

cc: Mr. James P. O'Reilly
Regional Administrator, Region II

8246164346

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/82-58

NRC COMMENT

Technical Specification 6.4.D requires the licensee to follow procedures established in compliance with Technical Specifications 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)

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated. It is important to note that the error in each case was licensee identified before the reactor had reached the power range and the absence of the fuses would have been self-disclosing. Immediate corrective action was taken. Additionally, the incident resulted from failure to follow procedures which had been modified to preclude such an event. In light of the above, Vepco considers these events not to be symptomatic of basic flaws in the Safety Program but rather isolated occurrences admittedly similar in nature.

2. REASONS FOR VIOLATION:

The violation is resultant from an individual's failure to follow procedural controls.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Subsequent to this event additional procedural controls were implemented to 1) clarify the requirement for using approved jumpers for pulled fuses, and 2) include a pre-start up checklist to be performed by an Instrument Supervisor which verifies proper alignment of all reactor protection and engineered safeguards instrumentation. In addition, emphasis on procedural compliance has been stressed to all station employees. These

actions have provided an effective program that ensures proper system alignment and operator awareness of procedural requirements and system status.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Engineering is conducting a review to determine if design changes to this and similar systems will mitigate the opportunity for this type of incident.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

LINE	DATE	INVOICE NO/OR DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
1	05/10/82	-ENFORCEMENT CIVILPENALT	50,000.00	0.00	50,000.00

ATTACHED CHECK ISSUED AS PAYMENT OF ITEMS LISTED ABOVE - PLEASE DETACH STUB AND CASH CHECK PROMPTLY

Vepco

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA

88-589
514

BANK OF VIRGINIA

VOID IF NOT CASHED IN 90 DAYS

03301 25 0028825 0000500000

PAY FIFTY THOUSAND AND 00/100 DOLLARS

TO THE ORDER OF
UNITED STATES NUCLEAR
REGULATORY COMMISSION
NUCLEAR REG C DC 20555

BK	CHECK NO	DATE	VENDOR NO	AMOUNT
25	28825	06/02/82	3301	\$50,000.00

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