

REGIONAL REGION
VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

92 NOV 8 P 3 07
October 29, 1982

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 571
NO/RMT:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of September 29, 1982 in reference to the inspection conducted at Surry Power Station between August 2 and September 3, 1982 and reported in IE Inspection Report Nos. 50-280/82-24 and 50-281/82-24. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports 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,

W. L. Stewart
W. L. Stewart

Attachment

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/82-24 AND 50-281/82-24

NRC COMMENT:

As a result of the inspection conducted on August 2 - September 3, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

Criterion XVI of Appendix B to 10 CFR 50, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, and nonconformances are promptly identified and corrected. Section 16 (Corrective Action) of the VEPCO NPS QA Manual and Administrative Procedure 86 establish the measures and procedures for identifying, correcting, and appropriately reporting conditions adverse to quality.

Contrary to the above, on August 10, 1982, conditions adverse to quality were not identified and corrected, in that a roof leak, caused by previous maintenance work, degraded safety-related equipment. During heavy rains, significant quantities of rainwater leaked through the Unit 2 Safeguards Building (valve pit) roof plugs onto the low head safety injection pump (2-SI-P-1A) motor and LHSI motor operated valves MOV-2890A, B, C. The LHSI pumps were tested and verified operable, however the ECCS valves MOV-2890 A and B (LHSI to hot legs) and MOV-2890C (LHSI to cold legs) were found slightly degraded and subsequently found electrically grounded on August 12, 1982. Electrical power to these MOV's is removed during power operations in accordance with Technical Specification 3.3.A.9 and 10, with 2890C open and 2890 A and B closed.

This is a Severity Level V violation (Supplement I). A similar occurrence was identified in Inspection Report No. 50-281/80-47.

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is corrected as stated.

(2) REASONS FOR VIOLATION:

Damage to the roof plugs of the Unit 2 Valve Pit while transferring heavy construction equipment resulted in a roof leak around the roof plugs.

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

All rainwater which had leaked through the valve pit roof was removed and all equipment was verified operable. The complete roofs of both Unit 1 and 2 Valve Pits have been covered with fire retardant plastic and sealed. Inspections following recent rainfalls have shown these temporary measures to be effective. In addition, weekly inspections of these roofs are being conducted.

Following an inspection by an inspection service in April, 1982, a bid package was prepared and sent to vendors in August, 1982. After unsatisfactory responses, a second bid package was sent to other vendors in September, 1982. Bids are currently being negotiated with a contract expected in November 1982. Repair and replacement work will then proceed as allowed by weather conditions.

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

The roof repairs described above will further protect equipment from storm and water damage. In addition, a closing inspection will be conducted each time roof plugs are removed. The roof refurbishment is expected to be completed no later than April 30, 1983.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.