VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

August 10,1983

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

Serial No. 409
NO/WDC:acm
Docket Nos. 50-280
50.281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of July 11, 1983 in reference to the inspection conducted at Surry Power Station between April 1 and April 30, 1983 and reported in IE Inspection Report Nos. 50-280/83-13 and 50-281/83-13. Our response to the specific infractions are attached.

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,

W. L. Stewart

Attachment

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

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/83-13 AND 50-281/83-13

A. NRC COMMENT:

Technical Specification 6.4.J requires that the facility fire protection program and implementing procedures, which have been established for the station, shall be implemented.

Contrary to the above, fire protection implementing procedure ADM-56, "Special Processes Involving Ignition Sources", was not implemented on April 29, 1983, in that a Welding or Flame Permit was not completed or issued when a propane torch was used to melt a boric acid line plug in the auxiliary building CVCS. The 13% boric acid solution had solidified and plugged the one inch pipe elbow to flow transmitter FT-1113, due to a heat tracing failure. Unit 1 was in cold shutdown condition when the plug and repairs occurred and verbal authorization was given by the Shift Supervisor and Fire Marshall prior to ignition of the torch.

This is a Severity Level V Violation (Supplement I) applicable to Unit 1 only.

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as written.

(2) REASONS FOR VIOLATION:

The judgement of an SRO concluded that to preserve a boric acid flowpath to the core it would not be imprudent to exercise the protective measures delineated in ADMIN 56 without prior completion of required forms. Consequently, the Fire Marshall was contacted via telephone for approval, another SRO was dispatched to the unlagged piping area and after verifying minimal transient or fixed fire loading coupled with the accessibility of fire suppression water proceeded to apply heat as described in the notice of violation.

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

All operators have been required to review the written requirements of Administrative Procedure 56. Additionally the event has been reviewed and discussed with the personnel involved.

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

No further action is planned.

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

Full compliance has been achieved.

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/83-13 AND 50-281/83-13

B. NRC COMMENT:

10 CFR 50, Appendix B. Criterion XVI, Corrective Action, and Section 16 of the VEPCO NPS QA Manual require that measure shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations and nonconformances are promptly identified and corrected.

Contrary to the above, adequate measures have not been established to ensure that the lagging and insulation on the Unit 2 heat traced boric acid lines in the chemical volume and control system (CVCS) and the boric acid flow paths to the RCS are intact or otherwise identified and corrected. For example, on April 29, 1983, the following Unit 2 boric acid lines had marginal insulation during power operations:

a. One inch boric acid (BA) line to the blender,

b. Several areas along the manual emergency borate line, and FT-2110 piping to MOV-1350 (which is blank-flanged),

c. BA storage tank 1C outlet to CH-130, and BA transfer pump 1-CH-P-2D suction piping near valve CH-113. Flow was verified in the a. and c. lines above.

This is a Severity Level V Violation (Supplement I) applicable to Unit 2 only.

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

The missing or marginal insulation on the heat traced boric acid lines is apparently due to damage/removal resulting from various jobs related to the heat tracing design change. The violation is the result of inadequate job follow-up in that the insulation was not replaced subsequent to damage/removal. Another reason for this violation is inadequate surveillance and/or deficiency reporting in high traffic areas such as the Auxiliary Building 13 ft level near the Boric Acid Transfer Pumps.

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

The missing or marginal insulation on the affected heat traced boric acid lines has been replaced.

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

Increased use of aluminum cladding over the insulation has been initiated for CVCS piping in the vicinity of the Boric Acid Transfer Pumps to prevent extensive insulation damage. Instructions were issued on June 15, 1983 that insulation may only be removed by insulation specialists and these insulation specialists have been scheduled to provide seven days per week coverage.

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

Full compliance was achieved in June 1983.