

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry

Docket Nos. 50-280 and 281
License Nos. DPR-32 and 37

The following violations were identified during an inspection conducted on February 6 - 10, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

10 CFR 50 Appendix B, Criterion XVI, as implemented by VEPCO Topical Report VEP-1-3A, paragraph 17.2.16, requires the licensee to establish measures to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the requirements of Criterion XVI, measures established by the licensee did not assure the prompt correction of conditions adverse to quality, as exemplified by the licensee's failure to obtain prompt correction of identified instances of nonconformance and conditions which could, and subsequently did, lead to additional nonconformance. The specific instances referred to involve nonconformance with the requirements of the inservice inspection code specified by 10 CFR 50.55 a(g) (i.e., the ASME Boiler and Pressure Vessel Code, Section XI - hereafter the "Code") and are as follows:

1. The Code requires that the licensee obtain and utilize the services of an ASME Authorized Inspection Agency which will employ Inspectors and Inspection Specialists to witness and otherwise verify the acceptability of the licensee's performance of inservice inspections. As record of verification of acceptable inservice inspection, the Code requires the licensee to obtain the signature of the Inspection Agency's Inspector on a Code Data Report for each inservice inspection certifying that the inservice inspection examinations were in accordance with the Code. The Code Data Report and other specified information comprise inservice inspection reports which the Code requires the licensee to submit to the NRC within 90 days of completion of an inservice inspection.

Contrary to the above requirements, for a Unit 1 inservice inspection completed in 1982, the licensee did not obtain the Inspector's signature on the required Data Report and the Code inservice inspection report of which Data Report was to be a part, was not submitted to the NRC within the specified 90 days apparently because of the lacking signature. As of February 10, 1984, the submittal still had not been provided to the NRC. Licensee personnel were aware of the nonconformance but failed to promptly identify it in accordance with the licensee's procedures for obtaining corrective action and did not obtain prompt correction. The conditions were identified by the

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licensee for corrective action, over a year after the occurrence, in their Deviation Report S1-84-038.

2. The Code specifies requirements for ultrasonic examination procedures used in inservice inspections. In a letter to the licensee dated July 21, 1983, deficiencies in the ultrasonic examination procedures for the 1983 Unit 2 outage were identified and questioned by the Authorized Inspection Agency Inspection Specialist. The Specialist stated in the letter that, if the procedural deficiencies were not resolved, the Inspector would not sign the Data Report for the inservice inspection. In NRC Inspection Report 280, 281/83-19, dated September 1, 1983, the NRC inspector identified his concern that the deficiencies be corrected. The procedural deficiencies were not documented for disposition or otherwise addressed in any manner established by the licensee for assurance of prompt correction. The reported procedural deficiencies were not promptly resolved and were used in the inservice inspection completed September 28, 1983. As a consequence of the licensee's failure to promptly resolve the deficiencies two additional nonconformances with Code requirements occurred:

- The Data Report for the inservice inspection was not signed by the Inspector upon completion of the inservice inspection because of the unresolved procedural deficiencies.
- For lack of the signed Data Report the licensee did not submit inservice inspection reports to the NRC as required by the Code.

This is a Severity Level IV Violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: MAR 30 1984