

Yellow

DCS

JUL 30 1984

Virginia Electric and Power Company
ATTN: Mr. W. L. Stewart, Vice President
Nuclear Operations
P. O. Box 26666
Richmond, VA 23261

Gentlemen:

SUBJECT: PROPOSED CIVIL PENALTY ACTION: EA 84-52
INADEQUATE ADMINISTRATIVE CONTROL OF SNUBBER SERVICE LIFE MONITORING
PROGRAM (REFERENCE INSPECTION REPORT NOS. 50-280/84-11 AND 50-281/84-11)

A routine inspection was conducted by an NRC Region II inspector on March 20-23, 1984. This inspection included a review of the Surry Nuclear Station Snubber Service Life Monitoring Program (SLMP) administrative and managerial controls to assure the adequacy of the program. The findings of the inspection were discussed with facility management at the conclusion of the inspection and are contained in the inspection reports referenced. NRC concerns were discussed by the Regional Administrator of Region II with senior corporate management at an Enforcement Conference held at the NRC Region II Office on April 17, 1984.

The inspection findings established that the system for utilizing and controlling the snubber service life monitoring program was not adequate at the Surry facility. The Surry SLMP assumed that all hydraulic snubbers had been rebuilt during the steam generator replacement project (July 1980 for Unit 2 and July 1981 for Unit 1). A review of snubber maintenance records, which was prompted after discovering that some snubber failures were caused by incorrect seal material, disclosed that not all snubbers had been rebuilt during the steam generator replacement project. Therefore, the snubber program could not have detected program inadequacies (i.e., incorrectly designated snubber service life dates).

The NRC attaches great importance to comprehensive licensee programs for the detection, correction, and reporting of problems that may constitute or lead to violations of regulatory requirements. In this case, your program did not detect the program inadequacies in a timely manner. It was fortuitous that larger numbers of inadequate snubbers were not present. Meticulous and continuing attention by both management and technically qualified personnel must be provided to ensure proper performance of safety-related activities. We do note that once the magnitude of the problem became apparent to facility management, appropriate near-term corrective action was initiated.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

840E070357 84G730
PDR ADOCK 05000280
Q PDR

IE:14

Virginia Electric and Power Company 2

To emphasize the seriousness of this violation, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Forty Thousand Dollars (\$40,000) for the violation described in the enclosed Notice. The violation has been categorized at Severity Level III, in accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, 49 FR 8583 (March 8, 1984). The base civil penalty for a Severity Level III violation is \$50,000. However, since the violation cited occurred prior to issuance of the current Enforcement Policy, the base civil penalty amount under the previous Enforcement Policy, 47 FR 9987 (March 9, 1982) of \$40,000 is proposed.

You are required to respond to the enclosed Notice and you should follow the instructions specified therein when preparing your response. Your response should specifically address the effectiveness of corrective actions stated in your Licensee Event Reports of April 16 and 25, 1984, regarding your service life monitoring program for control of snubber maintenance and tracking. In your response, appropriate reference to previous submittals is acceptable.

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 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
ROBERT D. MARTINJames P. O'Reilly
Regional AdministratorEnclosure:
Notice of Violation and Proposed
Imposition of Civil Penaltycc w/encl:
J. H. Ferguson
Chief Operating Officer
W. S. Mistr, Manager - Security
J. L. Wilson, Station ManagerRII
GMNejfelt:ht
5/ /84RII
JMPuckett
5/ /84RII
RDMartin
5/ /84RII
RCLewis
5/ /84RII
JAOlshinski
5/ /84IE:ES
GKlingler/bts
7/ /84ELD
JLieberman
7/ /84ES:D
JAxelrad
7/ /84IE:DD
JTaylor
7/ /84IE:D
RDeYoung
7/ /84

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Sincerely,

James P. O'Reilly
Regional Administrator

Enclosure:
Notice of Violation and Proposed
Imposition of Civil Penalty

cc w/encl:
J. H. Ferguson
Chief Operating Officer
W. S. Mistr, Manager - Security
J. L. Wilson, Station Manager

RII
GMNejfelt:ht
8/ /84

RII
JMPuckett
5/ /84

RII
RDMartin
5/ /84

RII
RCLewis
5/ /84

RII
JAOrshinski
5/ /84

See attached memo
IE:ESR
GKlingler/bts
1/19/84

ELD via plan
JLieberman
1/17/84
OK

IE:DD
JTaylor
1/18/84

IE:DD
RDeYoung
7/24/84

Virginia Electric and Power Company 3

Distribution

PDR

NSIC

LPDR

ACRS

SECY

CA

RCDeYoung, IE

JTaylor, IE

JA Axelrad, IE

GKlingler, IE

JPO'Reilly, RII

JLieberman, ELD

VStello, DED/ROGR

FIIngram, PA

Enforcement Coordinators

RI, RII, RIII, RIV, RV

GMessenger, OIA

BHayes, OI

HDenton, NRR

MWilliams, NRR

JCrooks, AEOD

EJordan, IE

JNGrace, IE

JGagliardo, IE

IE:ES File

IE:EA File

EDO R/dg File

DCS

NRC Resident Inspector

Commonwealth of Virginia

Gerald Bailes, Attorney General
Supreme Court Building
Richmond, VA 23219

Thomas P. Harwood, Jr., Commissioner
State Corporation Commission
Jefferson Building
Richmond, VA 23219