

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Virginia Electric and Power Company
Surry Units 1 and 2

Docket Nos. 50-280 and 50-281
License Nos. DPR-32 and DPR-37
EA 84-52

A routine inspection was performed on March 20-23, 1984 by a Region II inspector as documented in Inspection Report Nos. 50-280/84-11 and 50-281/84-11. In accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, 49 FR 8583 (March 8, 1984), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the violation identified during the inspection and associated penalty are set forth below:

Technical Specification 4.17.F.1 requires that a snubber service life monitoring program be established to maintain a service life of each snubber, the date at which the designated service life commences, and the installation and maintenance records on which the designated service life is based.

Technical Specification 4.17.F.2 requires that concurrent with the first in-service visual inspection and at least once per 18 months thereafter, safety-related snubbers shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review.

Contrary to the above, the program implemented to monitor the service life of hydraulic snubbers was inadequate in that:

1. The selected date of July 1980, the date at which the designated service life of the Unit 2 snubbers commenced, was incorrect for a number of Unit 2 snubbers. Also, the selected date of July 1981, the date at which the designated service life of the Unit 1 snubber commenced, was incorrect for a number of Unit 1 snubbers.
2. Safety-related snubbers were not reviewed as required by Technical Specification 4.17.F.2 to verify that the indicated service life of the snubber would not be exceeded prior to the next scheduled snubber service life review. As a result, the service life of a number of Unit 1 and Unit 2 snubbers was exceeded.

This is a Severity Level III violation (Supplement I).
(Civil Penalty - \$40,000)

Pursuant to 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit to the Director, Office of Inspection and Enforcement, USNRC, Washington, D.C. 20555, with a copy to this office, within 30 days of the date of this Notice, a written statement or explanation, including for the alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation 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. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, the response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, Virginia Electric and Power Company may pay the civil penalty in the amount of Forty Thousand Dollars (\$40,000) for the violation, or may protest imposition of the civil penalty in whole or in part by a written answer. Should Virginia Electric and Power Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement will issue an order imposing the civil penalty in the amount proposed above. Should Virginia Electric and Power Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, such answer may: (1) deny the violation presented in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty. In requesting mitigation of the proposed penalty, the five factors addressed in Section V(B) of 10 CFR Part 2, Appendix C should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate statements or explanations by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. Virginia Electric and Power Company's attention is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay the penalty due, which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY
ROBERT D. MARTIN

/s/
James P. O'Reilly
Regional Administrator

Dated in Atlanta, Georgia
this 30th day of July 1984