

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry Units 1 and 2

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

The following violations were identified during an inspection conducted on April 1 - May 5, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification 6.4.A.2 requires that detailed written procedures with appropriate check-off lists and instructions shall be provided for the calibration and testing of instruments, components, and systems involving the nuclear safety of the station.

Contrary to the above requirement, the following periodic test procedures and post-maintenance testing procedure examined during the inspection period April 1 to May 5, 1984, did not provide appropriate check-off lists and instructions for testing the safety related instruments and components described below:

1. The Unit 1 and 2 Fire Protection Systems Periodic Test (PT) procedures do not insure that the applicable sections of Technical Specification 3.21, "Fire Detection and Suppression Systems", are met. For example, the fire detection instruments (heat and smoke detectors) in Table 3.21-1 of the TS (revised 1-17-84) are required to be functionally tested every six months. However, 1-PT-24.3B, PT-24.2A, and PT-24.2C which test the heat detectors in the cable tray room, the emergency diesel generator rooms (1 and 3), the fuel oil tank room, and the fuel oil transfer pump house, are scheduled to be performed during refueling outages (every 18 months). In addition, the periodic tests do not specifically identify (by ID number or location) the detectors to be tested. The testing techniques were also not defined, which resulted in the testing of certain smoke detectors by blowing inhaled cigarette smoke at the detectors in "No Smoking" areas. A major review of the program and procedures for fire protection systems testing is necessary.
2. Electrical preventative maintenance procedure PC-DB-E/RI, "Clean, Adjust and Service Breaker", describes the post-maintenance testing for the Westinghouse DB-50 reactor trip and bypass breakers. However, appropriate instructions for independently testing the undervoltage (UV) and shunt trip coils during various plant conditions were not provided in the procedure. For example, the procedure did not address reactor trip breaker shunt coil testing during shutdown conditions when the RPS and UV coils are deenergized, even though this is normally when the testing occurs. Consequently, deviations from the procedure occur when this testing is performed.

This is a Severity Level V violation (Supplement I).

- B. Technical Specification 6.4.J requires that the facility fire protection program and implementing procedures established for the station shall be implemented.

Contrary to the above requirement, Administrative Procedure (ADM)-56, "Special Processes Involving Ignition Sources", was not implemented on April 24, 1984, in that:

1. Daily inspections of three areas in the turbine and service building were required by the welding and flame permits, but were not documented on the permits.
2. Several copies of the Welding and Flame permits were not available in the reactor control room and certain Flame Permits were not attached to the Maintenance Request (MR) following completion of the work.
3. A fire watch was not maintained for at least one half hour after completion of cutting or welding operations to detect and extinguish any potential smoldering fires in the three areas inspected in item 1. above.

This is a Severity Level V 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.

JUN 20 1984

Date: _____