DMB

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

September 7, 1984

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 474A
NO/DWL:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. DeYoung:

We have reviewed your Proposed Civil Penalty Action (EA 84-52) letter of July 30, 1984 in reference to the inspection conducted at Surry Power Station between March 20, 1984 and March 23, 1984 and reported in IE Inspection Report Nos. 50-280/84-11 and 50-281/84-11. Our response to the specific infraction is attached.

Vepco is committed to operating our nuclear units in a totally professional manner and is aggressively pursuing improvements in our activities. We are, at the corporate level, presently conducting a thorough assessment of compliance programs, including the snubber programs at both Surry and North Anna Power Stations. These reviews address not only the technical and procedural, but also the organizational and policy aspects of the programs. The objective of this assessment is to insure the programs are in full compliance with the requirements.

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

Attachments
1. Response to Notice of Violation
2. Voucher Check in payment of Civil Penalty (Check No. 39613)

cc: Mr. James P. O'Reilly
Regional Administrator
Region II

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

IE:14

RESPONSE TO NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY

NRC COMMENT:

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 960295, and 10 CFR 2.205, the violation identified during the inspection and associated penalty are set forth below:

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)

1. ADMISSION OR DENIAL OF ALLEGED VIOLATIONS

The violations are correct as stated.

2. REASONS FOR THE VIOLATIONS

As stated in the Proposed Civil Penalty Action EA 84-52 dated July 30, 1984, the Surry service life monitoring program start dates were based on the assumption that all hydraulic snubbers had been completely overhauled and rebuilt during each Unit's steam generator replacement outage (July 1980 for Unit 2 and July 1981 for Unit 1). However, a number of snubber failures caused by seal problems prompted a records review which did not support this assumption.

3. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The records review revealed a complete maintenance package in the case of some of the snubbers confirming that an overhaul had been completed. The review also produced a list of snubbers for each unit whose service life start date could not be confirmed because of:

- o incomplete documentation indicating the snubber was only partially overhauled
- o inconclusive documentation which lacked sufficient identification to match an installed snubber
- o no documentation at all.

This issue was also addressed in Vepco's Licensee Event Reports dated April 16 and April 23, 1984. In these reports we outlined corrective actions taken or planned regarding our service life monitoring program for control of snubber maintenance and tracking. The results of these corrective actions are discussed below.

Snubbers whose service life start date could not be confirmed were either rebuilt or replaced during the March 1984 Unit 2 outage and the April 1984 Unit 1 outage as committed to in W. L. Stewart's March 30, 1984 letter Serial No. 190 to James P. O'Reilly.

The entire snubber program was reviewed, resulting in modifications to the governing Administrative Procedure and snubber Maintenance Procedures, and the development of a computerized service life monitoring program. Two new procedures were also generated; one for controlling the marking and identification of snubbers and another in the form of a Performance Test requiring periodic and timely record updates.

The Administrative Procedure was revised to clarify departmental responsibilities and requirements for visual and functional testing including acceptance criteria. Also, it provides a detailed methodology for identifying and marking snubbers and detailed requirements for service life monitoring. The Maintenance Procedure revisions included segregating the overhaul procedures from the testing procedures, discontinuing partial overhauls without a procedure deviation, and modifying the removal and reinstallation procedure to assure proper identification mark number recording.

Concurrent with these changes, a computer-based service life monitoring program was initiated. This program lists snubbers chronologically by service life expiration date. The initial data entry was based on firm auditable records that document the snubber service life start date.

We believe these actions have resulted in an effective program which includes procedural controls designed to preclude the possibility of missed surveillance or a snubber exceeding its service life. The long term effectiveness of the program will be audited by our QA department and we are confident that the corrective actions taken will result in improved snubber reliability.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The computer program in use, although adequate for service life monitoring, lacks the capability for tracking and trending all aspects of snubber maintenance and surveillance. Certain aspects are currently performed manually. Consequently, other commercially available programs which will provide this additional capability are under review. The implementation of a more flexible complete program will minimize the possibility of recurrence of this violation by providing pertinent data on snubbers in one readily accessible, easily sorted file.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the replacement and rebuilding of snubbers whose service life had been exceeded and with the revisions to the program procedures.

The computer program discussed above, although not a requirement, will aid in assuring that the program remains in full compliance.