

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

~~CONFIDENTIAL~~

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

84 SEP 5 10:19
August 24, 1984

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No. 472
NO/JDH:LMS
Docket Nos. 50-280
50-281
License Nos. DPR-32
CPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of June 27, 1984 in reference to the inspection conducted at Surry Power Station on June 3-30, 1984, and reported in IE Inspection Report Nos. 50-280/84-20 and 50-281/84-20. Our response to the specific violation is attached.

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

Attachment

cc: (w/attachment)

Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

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

8410240285 840918
PDR ADOCK 05000280
Q PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-20 AND 50-281/84-20

The following violations were identified during an inspection conducted on June 3-30, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification 6.4.A.7 requires that detailed written procedures with appropriate check-off lists and instructions shall be provided for preventative or corrective maintenance operations on safety related equipment.

Contrary to the above requirement, the corrective maintenance procedure (electrical) for safety related motor operated valves, EMP-C-MOV-50, "Torque Switch Adjustments", did not contain appropriate instructions for setting or adjusting the Limitorque (SME-000) double torque switch on the Unit 1 and 2 service water (SW) motor operated valves SW-MOV-103A through D and SW-MOV-203A through D, which supply water to the recirculation spray heat exchangers during accident conditions. EMP-C-MOV-50 did not provide instructions for mid-positioning or manually declutching the MOV before setting or adjusting the torque switches, which apparently resulted in the incorrect torque switch settings on SW-MOV-203D observed by the inspector on June 5, 1984.

This is a Severity Level IV violation (Supplement I), and applies to both units.

VEPCO RESPONSE:

(1) ADMISSION OF THE ALLEGED VIOLATIONS:

The violation is correct as stated.

(2) THE REASON FOR THE VIOLATION:

Certain models of Limitorque torque switches require that the associated valve be in a relaxed position during the setting of the torque switch. This requirement was not specified in the procedures for torque switch settings on the subject valves because it was not specified in the manufacturer's technical manual.

(3) THE CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Corrective Maintenance Procedure EMP-C-MOV-50 was revised to give adequate instructions for setting or adjusting Limitorque torque switches. In addition, Surry Power Station has implemented a program to verify proper torque switch settings on all safety-related MOV's.

(4) THE CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

All torque switch settings on safety-related MOV's will be verified, and the settings or adjustments will be made in accordance with the approved procedure.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Corrective Maintenance Procedure EMP-C-MOV-50 was revised on June 14, 1984. The verification of proper torque switch settings on all safety-related MOV's has commenced and will be completed by November 23, 1984.