

85 FEB 26 A 9:53

February 15, 1985



VIRGINIA POWER

Dr. J. Nelson Grace  
Regional Administrator  
Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30323

Serial No. 85-019  
NO/HLM:DLN  
Docket Nos. 50-280  
50-281  
Licensee Nos. DPR-32  
DPR-37

Gentlemen:

We have reviewed your letter of January 7, 1985 in reference to the inspection conducted at Surry Power Station on October 22-26, 1984, and reported in IE Inspection Report Nos. 50-280/84-33 and 50-281/84-33. Per a telephone conversation on February 5, 1985, between Mr. D. A. Sommers (Virginia Power) and Mr. V. L. Brownlee (NRC), an extension until February 15, 1985 was granted to respond to the Notice of Violation. Our responses to the specific violations are attached.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power 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

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Q PDR

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/84-33 and 50-281/84-33

VIOLATION:

10 CFR 50, Appendix B, Criterion XII and the licensee's accepted quality assurance program require that measures be established to assure that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, calibration of gauge blocks and micrometers are conducted in an environment which could adversely affect their accuracy in that environmental controls similar to those established for the calibration of the reference standards are not maintained at the Surry Nuclear Power Station Certification Laboratory.

This is a Severity Level IV Violation (Supplement I).

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

2. REASONS FOR VIOLATION:

Environmental controls as required by gage block and measuring equipment vendor technical information is not provided for the Mechanical Tool Room Calibration Area.

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

Additional capacity has been added to the Tool Room HVAC system as an interim method of providing a more stable environment. Also, more accurate temperature measuring equipment (sling psychrometer) will be used.

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

A separate enclosure will be constructed and will include sufficient HVAC to control the inside environment within prescribed limits. The enclosure will be used for storage of gage blocks and calibration checks of measuring equipment.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by November 1, 1985.

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/84-33 and 50-281/84-33

VIOLATION:

10 CFR 50, Appendix B, Criterion V and the licensee's accepted quality assurance program require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, calibration activities are conducted at Surry Nuclear Power Station Certification Laboratory and the Instrument Laboratory without the use of laboratory implementing procedures. Documented procedures to provide guidance to laboratory personnel have not been prepared.

This is a Severity Level IV Violation (Supplement I).

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

a. Certification Laboratory

The violation is correct as stated.

b. Instrument Laboratory

The violation is correct as stated in that specific procedures for calibration of each instrument in the Instrument Laboratory have not been prepared. However, station Administrative Procedure 84 (Section 5.2.2.2.1) requires that all measuring and test equipment will be calibrated in accordance with manufacturer's instructions or approved written procedures. Written procedures have been prepared in those cases where adequate manufacturer's instructions were not available. In other cases, calibration activities are being performed in accordance with the manufacturer's instructions, and the results of the calibrations are being recorded in the individual instrument history folders.

2. REASONS FOR VIOLATION:

a. Certification Laboratory

Calibration checks were being performed using guidance included in station procedure ADM 86, vendor technical information and the experience of the individual performing the checks. Virginia Power personnel incorrectly considered these measures to be adequate.

b. Instrument Laboratory

Virginia Power personnel incorrectly believed that the existing program had adequately provided guidance to laboratory personnel and had properly documented the calibration status of laboratory instruments, making additional procedures unnecessary.

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

a. Certification Laboratory

The individual assigned to perform calibration checks of measuring equipment has received additional training and increased emphasis has been put on the use of vendor technical information when performing these checks.

b. Instrument Laboratory

None

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

a. Certification Laboratory

New procedures will be implemented to provide better guidance to personnel involved in calibration checks.

b. Instrument Laboratory

In order to further improve the existing program, the following steps will be taken:

- (1) A general procedure will be developed which will address use of the manufacturer's technical manual, documentation on the Instrument History Card, and test equipment to be used in calibrating instruments. This information will help to ensure traceability to the calibration standards of the National Bureau of Standards.
- (2) In addition, a cross-reference of station test equipment versus manufacturers' technical manuals will be developed.
- (3) History sheet folders will be expanded to contain calibration information to provide further guidance to laboratory personnel.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

a. Certification Laboratory

Full compliance will be met by October 1, 1985

b. Instrument Laboratory

(1) Item 1 will be completed by April 30, 1985

(2) Item 2 will be completed by May 31, 1985.

(3) Item 3 will be completed by July 31, 1985.