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March 21, 1985



VIRGINIA POWER

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

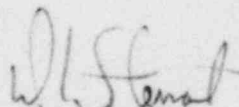
Serial No. 85-139
NO/HLM:dn
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Dr. Grace:

We have reviewed your letter of February 20, 1985 in reference to the inspection conducted at Surry Power Station on December 1, 1984 - January 4, 1985 and reported in IE Inspection Report Nos. 50-280/84-36 and 50-281/84-36. Our response to the specific violation is 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

8505230598 850401
PDR ADOCK 05000280
Q PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-36 and 50-281/84-36

VIOLATION

Technical Specification (TS) 3.6.B.1 requires that prior to exceeding 350 F or 450 psig in the Reactor Coolant System (RCS), one of the three auxiliary feedwater (AFW) pumps for the opposite unit shall be available. In addition, TS 3.6.D requires that the system piping, valves, and control board indication required for the operation of the opposite unit AFW pump be available.

Contrary to the above, Unit 2 was operated at full power from September 28, 1984, to October 30, 1984, with the Unit 1 AFW pumps not available to Unit 2 because the motor operated cross-tie valve MOV-FW-260A was closed and not available (without indication) due to the tagout and opening of its electrical breaker 1H1-211.

This is a Severity Level IV violation (Supplement I) and applies to Unit 2.

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated. Operations personnel discovered this condition during a Plant Tagout Review.

(2) REASONS FOR VIOLATION:

The reason for this violation is an error in plant drawings. Both tagouts involved were proper with respect to plant drawings, but the drawings were inaccurate with respect to the as-built condition.

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

As described in LER 84-017 dated January 4, 1985, the piping and instrument drawing located in the control room was temporarily changed on December 4, 1984 to reflect the as-built condition and later permanently revised. An engineering review of other station drawings and procedures related to the auxiliary feedwater crosstie was conducted. The review identified necessary updates to some electrical drawings. In addition, changes were identified in valve line-up procedures.

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

The appropriate electrical drawings will be updated to reflect as-built conditions and cable tagging will be verified to correct any tagging deficiencies found. The valve lineup procedures will also be updated to reflect unit assignment of the cross-tie MOV's.

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

Full compliance was achieved on December 4, 1984. The additional actions identified by engineering review will be completed by May 1, 1985.