

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

August 7, 1979

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
Federal Nuclear Regulatory Commission
Washington, DC
1400 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 589
PO/RMT:baw
Docket No. 50-379

License No. CPPR-78

Mr. O'Reilly:

I have reviewed your letter of July 11, 1979, in reference to the inspection conducted at North Anna Power Station Unit No. 2 on June 19 and 22, 1979, and included in IE Inspection Report No 79-36. Our response to the specific information is attached.

I 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 record.

Very truly yours,

C. M. Stallings

C. M. Stallings
Vice President-Power Supply
and Production Operations

Attachment

cc: Mr. Albert Schwender

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RESPONSE TO NON-COMPLIANCEITEMS REPORTED IN THE INSPECTION REPORT NO. 50-339/79-15Current

As required by 10 CFR 50 Appendix 'B', Criterion XI which states in part: "Test results shall be documented and evaluated to assure that test requirements have been met." This requirement is further defined in VEP-1 3-6, Appendix Report Quality Assurance Program Operations Phase, Section 11.2.11, and the Nuclear Power Station Quality Assurance Manual, Section 11.2.11, and the Nuclear Power Station Quality Assurance Manual, Section 11, paragraph 5.1.1.d which requires "The Supervisor - Engineering Services, the Plant Test Group, and the Station Nuclear Safety and Operating Committee shall be responsible for reviewing the test results and determining if the results meet established acceptance criteria..." and Test Control Instructions Preoperational Test Covers and Results Sheet and Chronological Log Sheet Item 11 which requires "The test engineer and/or individual(s) performing the test shall note the resolution of the discrepancies..."

In reply to the above, 2-PO-33 Chemical and Volume Control System Test during Hot Functionals, results approved June 13, 1979, in the Discrepancy section of the Test Results indicates in Item 4, that acceptance criteria was not met. The resolution for that item states "MR #N2-79-0151128 submitted to instrument shop cleared on 1-26-79." The completed report stated that "Procedural Error by Submitter - No Problem Found". In addition, it states the test engineer was informed of the error. There are no additional entries in the procedure to indicate a resolution to the discrepancy.

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Response

In reply to the above comment in Item 4 of the Discrepancy section of the Test Results, maintenance report N2-79-0151128 is in error. Maintenance report N2-79-0151128 pertains to Discrepancy Item 7 involving valve TCV-CC-206 not operating properly. The work for that item was performed satisfactorily and valve TCV-CC-206 operated properly. Maintenance report N2-79-04061136 deals with Item 4 of the Discrepancy section.

The above infraction is correct. Specifically, pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is submitted:

1. Corrective steps which have been taken and results achieved:

As indicated in the NRC Comment listed above, the problem with TI-2144 was not cleared by the submitted maintenance report N2-79-04061136. During the investigation of the problem with TI-2144, it was discovered that TI-2143 controls valve TCV-2143 instead of TI-2144. On 6-21-79, Instrumentation Calibration Procedure ICP-P 2-T-143 was performed.

966 293

Attachment: Page 2 of 2

TI-2143 and TCV-2143 to verify calibration and proper operation. It was discovered that TI-2143 was in calibration and that TCV-143 operated properly when the setpoint of $136 \pm 5^\circ\text{F}$ was simulated. A supplemental information form will be added to Z-PO-33 in accordance with NPS Section 11, paragraph 5.1.6.

Corrective action taken to avoid further non-compliance:

All Test Engineers shall be notified as to review and ensure that all compliance reports have been satisfactorily completed prior to the initiation of the pre-operational tests.

Date when full compliance will be achieved:

Full compliance has been achieved as of the date of this response.

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966 294

Response to Non-Compliance Items Reported in
18 Inspection Report No. 58-339/79-36

Item Comment

As required by 10 CFR 50 Appendix 'B', Criterion V which states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings." This requirement is further defined in P-1-36, Topical Report Quality Assurance Program Operations, Section 11, paragraph 5.3.1 which requires "It shall be the responsibility of the initiator of a change to fully document his suggestions and to insure that it can be given an expeditious and thorough review. The 'REQUEST TO CHANGE PROCEDURE' shall be completed in accordance with attached instructions and forwarded to the cognizant supervisor.

Contrary to the above, 2-PO-66 D.C. Power System Test, results approved July 14, 1979, had changes made to the following paragraphs which were not authorized to be changed by "Request to Change Procedure" paragraphs 4.3.5, 4.4.23, 4.6.17, 4.7.6, 5.2.1, 5.2.2, 5.2.3, and 5.2.4.

This is a deficiency.

Explanation

The above deficiency is correct, but is not stated properly. The changes should have been documented on "PROCEDURE DEVIATION" form in accordance with 10 CFR Section 5.0, paragraph 5.4.1. The "REQUEST TO CHANGE PROCEDURE" is used for permanent changes to an approved procedure, while a "PROCEDURE DEVIATION" form is used for temporary changes or deviations. The following should have been documented in the "PROCEDURE DEVIATION" form:

In steps 4.3.5 and 4.7.6, should have been listed in Procedure Deviation #3. The second sentence of each step should have been changed to read: "Maintain at least a 200 ampere rating during the entire charger load test". The reason for the deviation being Testing requirements do not specify an upper limit. Unit 2 Test. Spec. require that the charger load be at least 200 amperes.

In step 4.4.23, 2-I should read 2-II. This is a typographical error. Section 4.4 concerns itself with Battery 2-II discharge and recharge test. Battery 2-II is on DC bus 2-II not on DC bus 2-I.

In step 4.6.17, 2-II should read 2-III. This is a typographical error. Section 4.6 concerns itself with battery 2-III discharge and recharge test. Battery 2-III is on DC bus 2-III discharge and recharge test. Battery 2-III not on DC bus 2-II.

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966 295

Steps 5.2.1, 5.2.2, 5.2.3, and 5.2.4, should have been listed in Procedure Deviation #5. In each of these steps "during" should have been changed to "prior to". The reason for the deviation being: IEEE std 450-1975 states that the K_1 (capacity correction factor) relates to the cell temperature at the start of the test.

Pursuant to specification 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is provided:

1. Corrective steps taken and results achieved:

The failure to document the procedure changes had no adverse effects on this test. The test still met the acceptance criteria. The necessity of utilizing a procedure deviation in this instance was discussed with the specific test engineer involved.

2. Corrective action taken to avoid further non-compliance:

These items were discussed and reviewed with the station test engineers to insure the proper guidelines were followed while running a test. The importance of a proper document review was also discussed. In order to reduce the number of administrative errors, completed procedure will now be given two independent engineering reviews prior to the review by the Engineering Supervisor specifically for finding errors in documentation.

3. Date when full compliance will be achieved:

Full compliance has been achieved as of the date of this response.

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