

USNRC REGION I  
ATLANTA, GEORGIA  
VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

19 JUN 3 9:15

June 6, 1979

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region II  
Atlanta, Georgia 30303

Serial No. 385  
PO/FHT:baw  
Docket No.: 50-338  
50-339  
License No.: NPF-4  
CPFR-78

Dear Mr. O'Reilly:

We have received your letter of May 14, 1979, in reference to the inspection conducted at North Anna Power Station Units 1 and 2 on April 17, 1979, and reported in IE Inspection Report Nos. 50-338/79-19 and 50-339/79-25. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure.

Very truly yours,

*W. C. Stallings*  
C. M. Stallings

Vice President-Power Supply  
and Production Operations

Attachment

cc: Mr. Albert Schwencer

412 251

7907230014

790376  
OFFICIAL COPY

Response to Non-Compliance Items Reported in IE  
Inspection Report No. 50-339/79-25

NRC Comment:

As required by 10 CFR 50, Appendix B, Criterion VI, a test program shall be established to assure that all testing required is performed in accordance with written test procedures which incorporate requirements and acceptance limits. These requirements are implemented by the approved Topical Report Quality Assurance Program, Section 17.1.11, and the Nuclear Power Station Quality Assurance Manual (NPSOAM), Section 11, paragraph 5.1.4. The NPSOAM requires that the individual (s) performing the test record the information required by the test procedure and initial each step as it is satisfactorily completed.

Contrary to the above:

1. During the performance of preoperational testing procedure 2-PO-39.2, Residual Heat Removal System Heat Removal Capacity, test results approved April 10, 1979, the flow to the tube side of the residual heat removal heat exchanger was not established at  $4000 \pm 50$  gpm as required by step 4.1 of the procedure. The calculations indicate a flow rate less than the required flow. Additionally, the step was initialed as having been satisfactorily completed.

2. During the performance of preoperational testing procedure 2-PO-39.1, Residual Heat Removal System Testing at Cold Conditions, test results approved January 12, 1979, the discharge pressure gauges used to record the residual heat removal pump discharge pressure on the data sheet were not the same gauges as required by steps 4.1.4 and 4.1.8 of the procedure. Again the steps were initialed as having been satisfactorily completed.

This is an infraction.

Response

The above infraction is not completely correct as stated. Specifically, item 2 states that improper gauges were utilized to record residual heat removal pump discharge pressure. A review of the test and the residual heat removal system indicates that the correct gauges were utilized. Because of the placement of check valves in the discharge piping of the residual heat removal pump, it is not possible for the pressure gauge of the non-operating pump to indicate a discharge pressure from the operating pump. The error found on the data sheet was a result of the test engineer recording the wrong gauge mark number. This error was purely administrative in nature.

Pursuant to specification 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 taken and results achieved:

With reference to item #1, the fact that a lower flow rate was present resulted in a much more conservative estimate of the heat transfer capabilities. Since the acceptance criteria were met, this had no adverse effect on the test. In addition, the lower flow rate is fully documented in the chronological log. The necessity of utilizing a procedure deviation in this instance was discussed with the specific test engineer involved.

With reference to item 2, the gauge mark numbers were corrected utilizing the guidelines contained in NPSQAM section 5.7.

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

These items were discussed and reviewed with the station test engineers to insure that 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 procedures will be reviewed by an engineer 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.