

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 10, 1979

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 667
PO/DLB:baw
Docket Nos. 50-338
50-339

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Dear Mr. O'Reilly:

This is in response to your letter of August 7, 1979, in reference to the inspection conducted at North Anna Power Station on May 14 - June 15, 1979 and reported in IE Inspection Report Nos. 50-338/79-28 and 50-339/79-35. Our responses to the violations are attached.

This letter also provides supplemental information to our letter of July 17, 1979, Serial No. 532, which was our response to a notice of violation included in your letter of June 25, 1979. The violation included in that letter involved an instance of failure to follow internal procedures for communication of potentially reportable items. One of our corrective actions was to reinstruct the persons directly involved in this occurrence in the specifics of reporting procedures. In subsequent discussions with our Resident Inspector, we agreed that additional reinstruction of personnel would be appropriate. Accordingly, we will complete reinstruction of the following personnel in the specific requirements of the applicable reporting procedures by September 15, 1979.

- 1) Onsite Production Operations Department personnel who are associated with construction units.
- 2) Power Station Engineering and Construction Department onsite construction personnel.
- 3) Stone & Webster and Fishbach & Moore supervisory personnel.

Very truly yours,

W.C. Stallings
C. M. Stallings

Vice President-Power Supply
and Production Operations

cc: Mr. Albert Schwencer

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RESPONSE TO NOTICE OF VIOLATION
REPORTED IN IE INSPECTION REPORT NOS.
50-338/79-28 and 50-339/79-35

NRC COMMENT (APPENDIX A)

As required by Criterion XVI of Appendix B to 10 CFR 50, conditions adverse to quality shall be documented and identified to appropriate levels of management. Paragraph 6.1 of Section 5.13 of Virginia Electric and Power Company's (VEPCO) Quality Assurance Manual, Engineering and Construction, requires that each suspected failure to comply with the Atomic Energy Act or with NRC rules, orders, or licenses, and each deviation be reported on Form 4883.8C. Upon completion, a copy shall be hand carried to the Executive Manager Licensing and Quality Assurance or his designee.

Contrary to the above, information concerning the failure of 2-EP-MC-11, a safety related motor control center, on May 16, 1979, was not forwarded to the Project Engineer until May 29, 1979. This failure was subsequently reported to the NRC under provisions of 10 CFR 50.55(e).

This is an Infraction. A similar item was brought to your attention in our letter dated June 25, 1979.

Response

The above comment is correct.

1. Corrective steps taken and results achieved

As cited in your comment, a similar item was the subject of a Notice of Violation in your letter of June 25, 1979. Our initial corrective actions in response to that notice were described in our letter of July 17, 1979, (Serial No. 532). As explained in the cover to this letter, additional corrective actions have been identified and will be completed by September 15, 1979. The corrective actions as amended involve the reinstruction of several categories of onsite personnel in the specifics of the applicable reporting procedures. Due to the similarity of the two items, the corrective actions taken in response to the earlier item are applicable to and adequate for the above listed item.

2. Corrective action taken to avoid further non-compliance

The above referenced corrective actions are sufficient to prevent recurrence.

3. Date when full compliance will be achieved

While the formal reinstruction of personnel will not be completed until September 15, 1979, we are now in compliance with the applicable reporting requirements.

NRC COMMENT (APPENDIX B)

Based on the results of the NRC inspection conducted on May 14 - June 15, 1979, the following item appeared to deviate from FSAR commitments:

Table 6.2-40 and Page 6-2-70 of the Units 1 and 2 FSAR state that the flow for each outside recirculation spray pump will be 3,640 gallons per minute (GPM).

Contrary to the above, restricting orifices found to be installed in the system on June 7, 1979, would have limited pump flows to 3,000 GPM each. As of that date, all pre-operational flow testing of this system had been completed.

Response

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:

The restricting orifices have been replaced with spectacle flanges having an inside diameter equal to the inside diameter of the pipe. Thus, there is no flow restriction and the system is in agreement with the FSAR.

2. Corrective steps which will be taken to avoid further deviations:

Reference Vepco letter S.N. 491 of June 18, 1979 written in compliance with 10 CFR 50.55(e) and Part 21. As explained in that letter, an Engineering and Design Coordination Report (E&DCR) P-688 was written in 1975 to install restriction orifices in the discharge piping of the outside recirculation spray pumps (ORSP) for both Units 1 and 2. In 1977 a separate net positive suction head (NPSH) problem was found with the ORSP's. A casing cooling system was designed for the permanent fix; however, to allow Unit 1 operation in the interim, a temporary modification was made to the ORSP discharge restriction orifice on Unit 1 only. This was accomplished by E&DCR P-2068. E&DCR's P-2068A and P-2068B subsequently changed the restriction orifices to full bore for Unit 1 only.

Since Unit 2 did not require the interim modification, it was not addressed in the E&DCR P-2068 series. We consider this to be an isolated incident and not a breakdown in the E&DCR program; therefore, no further actions are deemed necessary.

3. Date corrective actions were or will be completed:

Full compliance was achieved June 21, 1979.