

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 1, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No. 91-074
NAPS/JHL
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/90-29 AND 50-339/90-29
RESPONSE TO THE NOTICE OF VIOLATION

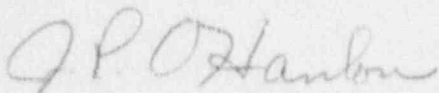
We have reviewed your letter of February 1, 1991 which referred to the inspection conducted at North Anna from November 18, 1990 through December 18, 1990 and reported in Inspection Report Nos. 50-338/90-29 and 50-339/90-29. Our response to the Notice of Violation is attached.

In your letter transmitting the Notice of Violation, you identified two issues. The first is that up-front safety evaluations should be performed for operating configurations inconsistent with the UFSAR. The second is that procedures and administrative controls thoroughly consider the design basis of the plant. To address the first issue, Safety Engineering Administrative Procedure SEAP-0002 was revised to provide the Shift Technical Advisor additional guidance for reviewing operating configurations and performing a 10 CFR 50.59 evaluation if required. In addition, licensed operators on each shift have received awareness training to preclude operating outside the assumptions of the UFSAR unless a 10 CFR 50.59 evaluation is reviewed and approved. Also, the process for revising procedures includes a review of the UFSAR to ensure the system being changed does not invalidate the design basis.

To address the second issue, the Design Basis Integration Review program has incorporated a process to review station documents and operating configurations against the design basis. As system design basis documents are approved and issued, System Engineering will review station documents and system operating configurations against the design basis.

If you have any further questions, please contact us.

Very truly yours,



for W. L. Stewart
Senior Vice President - Nuclear

Attachment

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PDR ADOCK 05000333
Q PDR

TEO/
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pc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. P. O'Hanlon who is Vice President - Nuclear Services, for W. L. Stewart who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 1ST day of March, 1991.

My Commission Expires: May 31, 1994.

Vicki L. Nuee
Notary Public

(SEAL)

RESPONSE TO THE NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTION CONDUCTED
BETWEEN NOVEMBER 18, 1990 AND DECEMBER 18, 1990
INSPECTION REPORT NOS 50-338/90-29 AND 50-339/90-29

STATEMENT OF VIOLATION

During an NRC inspection conducted between the period of November 18 through December 18, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990), the violation is listed below:

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Included in Appendix A of Regulatory Guide 1.33 are procedures for operation of the service water system.

Contrary to the above, operating procedures for the service water system were inadequate in that neither Procedure 1-OP-49.1, Revision 18, Service Water System Operation, nor other service water operating procedures specified that required alignments to reduce flow to the component cooling water heat exchangers be made in order to assure design basis flows to the recirculation spray heat exchangers, during all periods of time when a service water pump is inoperable. This procedural inadequacy contributed to a degraded recirculation spray system condition occurring during the 1990 Unit 2 refueling outage.

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

RESPONSE TO VIOLATION

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by not appropriately applying the requirements of Technical Specification 3.0.5 to the shared Service Water (SW) System when Unit 2 was shutdown and Unit 1 remained operating in Mode 1 - 4. Standing Order 165 and subsequent revisions were developed to address the adequacy of SW flow during a Design Basis Accident (DBA). However, the Standing Order failed to address emergency electrical power source requirements. Specifically, when the Unit 2 emergency diesel generator was out of service for extended maintenance, as allowed by Technical Specifications, the corresponding SW pump did not have its respective emergency power source available. Therefore, during a DBA the SW pump could not be assumed to be available due to the loss of emergency electrical power. During this plant operating configuration, conservative controls were not fully established to ensure design SW flow to the Unit 1 Recirculation Spray Heat Exchangers during a DBA.

3. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Upon discovery of the degraded condition, Technical Specification compliance was verified, the Station Nuclear Safety and Operating Committee reviewed the degraded condition for reportability, prompt notification per 10 CFR 50.72(b)(2)(iii)(D) was made to the NRC and the NRC Resident Inspector, and a 10 CFR 50.59 evaluation was performed to evaluate and document operation with two component cooling water heat exchangers.

In addition, Operations Standing Order 177 was implemented to ensure the service water system can supply adequate flow to necessary equipment in the event of a DBA and to ensure at least three service water pumps are maintained operable. LER N1/90-012-00 was submitted to document the degraded service water system condition. Also, applicable station procedures were revised to establish acceptable operating configurations of the SW system when service water pumps become inoperable, an independent compliance review was performed to ensure the revised procedures addressing inoperable service water pumps were effectively implemented, and the MERITS Technical Specifications were reviewed to ensure acceptable service water pump operating configurations were identified.

The service water system design basis document has been completed.

4. CORRECTIVE STEPS TO BE TAKEN TO AVOID FUTURE VIOLATIONS

Technical Specification changes and revisions to the UFSAR are being evaluated to clarify service water system and power source requirements in Modes 1 through 6.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Technical Specification changes will be submitted to the NRC for approval as required.