

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 2, 1990

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

Serial No. 90-121
NAPS/JHL
Docket Nos. 50-338
50-339
License No., NPF-4
NPF-7

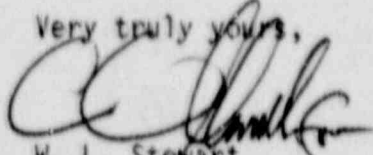
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/90-02 AND 50-339/90-02
REPLY TO THE NOTICE OF VIOLATION

We have reviewed your letter of March 2, 1990 which referred to the inspection conducted at North Anna between January 8 - 12, and 22 - 26, 1990 and reported in Inspection Report Nos. 50-338/90-02 and 50-339/90-02. The response to the Notice of Violation is provided in the attachment.

We have no objection to this correspondence being made a matter of public record. If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

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

Mr. J. L. Caldwell
NRC Senior Resident Inspector
North Anna Power Station

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RESPONSE TO THE NOTICE OF VIOLATION REPORTED DURING THE
NRC INSPECTION CONDUCTED BETWEEN JANUARY 8-12, 22-26, 1990
INSPECTION REPORT NOS. 50-338/90-02 AND 50-339/90-02

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on January 8-12, and January 22-26, 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 violations are listed below.

Technical Specification 4.0.5 requires inservice testing of ASME Code Classes 1, 2, and 3 valves in accordance with Section XI of the ASME Boiler Pressure Vessel Code and applicable Addenda except where specific written relief has been granted by the Commission. The licensee is committed to accomplish inservice testing in accordance with the 1974 Edition of the Code and Summer 1974 Addenda.

- A. Section XI, Subsection IWV-3520 requires check valves to be exercised at least once every three months.

Contrary to the above, check valves 1-SW-665, 1-SW-664, 1-SW-648, 1-SW-647, 1-SW-630, 1-SW-631, 2-SW-615, 2-SW-616, 2-SW-598, 2-SW-597, 2-SW-580, and 2-SW-581 were not being exercised.

- B. Section XI, Subsection IWV-6000 requires a system be developed and maintained defining all test procedures and listing all valves within the scope of the inservice testing program.

Contrary to the above, valves 1-SW-694, 1-SW-695, 1-SW-698, 1-SW-679, 1-SW-251, 1-SW-285, 1-SW-254, 1-SW-286, 1-SW-686, 1-SW-689, 1-SW-661, 1-SW-658, 1-SW-641, 1-SW-644, 2-SW-626, 2-SW-627, 2-SW-609, 2-SW-608, 2-SW-591, and 2-SW-592 were not incorporated into the inservice test program.

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

RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by personnel error. Personnel failed to include testing of the service water supply check valves and manual isolation valves to the charging pump coolers in the North Anna Inservice Testing (IST) Program due to inadequate review of ASME Section XI requirements.

Testing of the service water supply manual isolation valves to the charging pump lube oil coolers, gear coolers and seal coolers was being performed although was not included in the IST Program. Testing of the check valves in the supply lines to the charging pump gear coolers and seal coolers was also routinely tested although not included in the IST Program. Testing of the check valves that supply service water to the charging pump lube oil coolers was not performed or included in the IST Program.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Test procedures have been developed to include testing of the service water supply check valves to the charging pump lube oil coolers in the open direction.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

ASME Section XI requirements will be applied in subsequent testing of the service water supply check valves to the charging pump lube oil coolers.

The North Anna Inservice Testing Program will be revised to include testing of the service water supply check valves and manual isolation valves to the charging pump coolers. This revision will be included in the next scheduled upgrade of the IST Program.

An evaluation is being performed to determine if there are other valves that should be included in the IST Program and routinely tested that currently are not tested or included in the IST Program. Any additional valves that need to be included in the IST Program and routinely tested will be included in the next scheduled upgrade of the IST Program.

5.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The service water supply check valves to the charging pump lube oil coolers testing will be completed by June 30, 1990.

The North Anna Inservice Testing Program will be revised and submitted to the NRC for approval by June 14, 1990.