

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 22, 1993

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

Serial No. 93-114
JHL/MAE R5
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 & 2
INSPECTION REPORT NOS. 50-338/93-07 AND 50-339/93-07
REPLY TO A NOTICE OF VIOLATION

We have reviewed your letter of February 23, 1993, which referred to the inspection conducted at North Anna Power Station from January 25, 1993, to January 29, 1993, and reported in Inspection Report Nos. 50-338/93-07 and 50-339/93-07. Our reply to the Notice of Violation is attached.

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
Region II
101 Marietta Street, N.W.
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Mr. M. S. Lesser
NRC Resident Inspector
North Anna Power Station

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REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/93-07 AND 50-339/93-07

NRC COMMENT

During an NRC inspection conducted on January 25-29 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50.54(q) states that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect an emergency plan which meets the standards in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

10 CFR 50.47(b)(8) specifies the following emergency planning standard: "Adequate emergency facilities and equipment to support the emergency response are provided and maintained." This standard is met in part by Section 7.1.3 of the Emergency Plan, which states with respect to the Technical Support Center (TSC) that "The construction of the facility walls and design of the ventilation system are such that the whole body and thyroid doses received by occupants of the TSC are below GDC [General Design Criterion] 19 limits." To meet this goal, a fundamental aspect of the TSC ventilation system design is the provision of positive pressure in all areas of the TSC during operation in the emergency mode. 10 CFR 50.47(b)(8) is also addressed by Section 8.7 of the licensee's Emergency Plan (Revision 14, effective August 31, 1992), which states that "Emergency equipment shall be periodically tested to identify and correct deficiencies... The testing shall include ... every 18 months, functional and performance testing of the TSC ... Ventilation system." The licensee's procedure for functional and performance testing of the TSC ventilation system was 1-PT-77.9, "TSC Emergency Ventilation System Operability Test," Revision 2, approved July 19, 1989.

Contrary to the above, procedure 1-PT-77.9 was not adequate for identifying and correcting deficiencies in the function and performance of the TSC ventilation system. The procedure was not designed to identify, as unsatisfactory, a potential condition in which some areas of the TSC were not at a positive pressure relative to the facility surroundings when the ventilation system was operating in the emergency mode.

This is a Severity Level IV Violation (Supplement VIII).

REPLY TO A NOTICE OF VIOLATION

1. REASON FOR THE VIOLATION

The violation was caused by an inadequate procedure. Procedure 1-PT-77.9, Technical Support Center (TSC) Emergency Ventilation System Operability Test, would not have identified potential deficiencies associated with the TSC ventilation system. The acceptance criteria within the procedure required that the sum of three manometer readings be ≥ 0.125 inch water gauge. The procedure did not require that the individual manometers have positive pressure readings. This potentially permitted areas of the TSC to be at a negative pressure relative to facility surroundings when the ventilation system was operating in the emergency mode.

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

Procedure 1-PT-77.9 was revised on January 28, 1993 to reflect the correct acceptance criteria for positive pressure in the monitored areas of the TSC. The procedure was subsequently performed satisfactorily.

Previous performances of 1-PT-77.9 were reviewed to determine if any manometer readings were at a negative pressure that would have made the TSC ventilation system inoperable. Previous performances of 1-PT-77.9 were determined to be satisfactory.

Procedures associated with Local Emergency Operating Facility and Control Room ventilation systems were reviewed to determine if there were similar concerns. No similar concerns were noted.

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

No further corrective actions are required.

4. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.