

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 12, 1993

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

Serial No. 93-176
MPW/MAE R2
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. 50-338/93-08 AND 50-339/93-08
REPLY TO A NOTICE OF VIOLATION

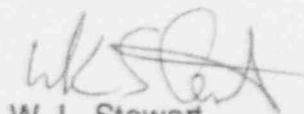
We have reviewed your letter of March 15, 1993, which referred to the inspection conducted at North Anna Power Station from January 17, 1993, to February 20, 1993, and reported in Inspection Report Nos. 50-338/93-08 and 50-339/93-08.

In the letter which transmitted the Notice of Violation, concern was expressed because the violation indicated continued problems associated with maintaining containment penetrations properly secured. Although, the occurrence was promptly identified and immediately corrected by station personnel, we agree that additional attention is required.

Management has reviewed the results and recommendations of a special task team assigned to review containment integrity failures, industry experience in this area, and the stations vulnerability in maintaining containment refueling integrity. We are implementing the recommendations to improve performance in this area. These actions include revising our refueling operation controlling procedures and modifying the scheduling of refueling activities to reduce the opportunity for containment refueling integrity breaches.

If you have any further questions, please contact us.

Very truly yours,


W. L. Stewart
Senior Vice President - Nuclear

Attachment

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

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

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/93-08 AND 50-339/93-08

NRC COMMENT

During an NRC inspection conducted on January 17, 1993, to February 20, 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:

Technical Specification 3.9.4 requires containment building penetrations to be in the following status: A minimum of one door in each airlock closed, and each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either: closed by an isolation valve, blind flange, or manual valve, or capable of being closed by an operable automatic Containment Purge and Exhaust isolation valve during core alterations or movement of irradiated fuel within the containment.

Contrary to the above, the outer personnel airlock door emergency escape hatch equalizing valve was not closed on January 16, and January 17, 1993, while the inner personnel airlock door was open during brief intervals and core alterations were in progress.

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

REPLY TO A NOTICE OF VIOLATION

1. REASON FOR THE VIOLATION

The violation was caused by personnel error. Administrative controls in place, by means of a caution statement stenciled to the personnel hatch door, did not prevent the operation of the emergency escape lock handle. The caution statement indicates that the operations shift supervisor must be contacted if the escape lock handle is operated. Inadvertent operation of the personnel hatch emergency escape lock handle actuated the equalizing valve on the personnel hatch door. In addition, the containment penetrations procedure only required verification that the equalizing valve is closed on one of two personnel hatch doors.

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

A special task team was assigned to review previous North Anna and industry events to determine what additional actions were warranted to assure that the required containment integrity is maintained during refueling.

The following recommendations made by the special task team are being implemented to ensure containment refueling integrity is maintained during future core alterations:

- a) Personnel responsible for hatch operation during the event have been trained on the use of the emergency escape lock and the need to maintain the equalization valves closed after containment refueling integrity has been established.
- b) The Controlling Procedure For Refueling, 1-OP-4.1, was revised to include verification that both personnel air lock emergency escape lock doors are closed prior to any core alterations. The procedure now requires that a qualified hatch operator be assigned to ensure the doors in the personnel air lock are properly operated when containment refueling integrity is required.
- c) The Containment Penetrations procedure, 1-PT-91, was revised to include controls to alert individuals that the shift supervisor's permission is required prior to operation of the escape lock handle. Steps were added to verify that both personnel air lock emergency escape lock doors are closed.
- d) The refueling outage planning schedule previously included a four hour maintenance window in which core alterations were suspended and containment integrity barriers were relaxed to facilitate maintenance activities (e.g. moving equipment in and out of containment). This four hour window was eliminated from the Unit 1 schedule prior to core alterations following the steam generator replacement. Requirements have been incorporated into the refueling outage planning process to maintain control over the maintenance window during future refueling outages.
- e) The maintenance procedures for controlling all penetrations through the equipment hatch temporary plate have been revised to ensure adequate protection from breaching containment integrity once core alterations commence.
- f) Unit 2 controlling procedures will be revised prior to the refueling outage scheduled for September 1993.

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

Corrective actions implemented on Unit 1 are sufficient to preclude recurrence.

4. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved for Unit 1 activities.