

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 7, 1994

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

Serial No.	94-611
NAPS/JHL/GSS	R7
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. 50-338/94-21 AND 50-339/94-21
REPLY TO A NOTICE OF VIOLATION

We have reviewed your letter of October 13, 1994, which referred to the inspection conducted at North Anna Power Station from August 21, 1994 to September 17, 1994, and the associated Notice of Violation which was reported in Inspection Report Nos. 50-338/94-21 and 50-339/94-21. Our reply to the Notice of Violation is attached.

In your transmittal letter you expressed concern with deleting fire protection damper inspections from the Fire Protection Program without adequate justification. We agree with your concern. A review of the change control process was performed by an engineering review team since the error that deleted the fire damper visual inspections occurred during the implementation of the change control process. Fire protection surveillance requirements were originally misinterpreted as not to require a visual inspection of the fire dampers. This misinterpretation was carried forward from the Updated Final Safety Analysis Report (UFSAR) to the Technical Requirements Manual (TRM). This error appears to be an isolated case. Therefore, a revision to the change control process is not planned. However, a review of the original fire protection surveillance requirements will be performed to ensure no other misinterpretations exist.

You also expressed concern with the implementation and oversight of the Fire Protection Program. We agree that the implementation and oversight of the Fire Protection Program may be a concern and have initiated action to evaluate the program. The current Fire Protection Program is described in Virginia Power Administrative Procedure (VPAP) 2401, "Fire Protection Program." Level I and II Projects have been initiated for the review of VPAP-2401 to (1) determine if

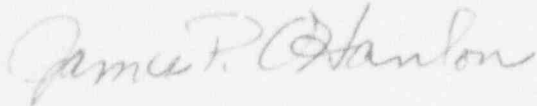
144054
9411150572 941107
PDR ADDCK 05000338
D PDR

JEON

responsibility of the Fire Protection Program is assigned to the correct groups, (2) ensure the program contains all Fire Protection/Appendix R requirements, and (3) verify that the coordination between the groups is acceptable. Following this review, changes to the program will be made as necessary.

If you have any further questions, please contact us.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

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

Mr. R. D. McWhorter
NRC Senior Resident Inspector
North Anna Power Station

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/94-21 AND 50-339/94-21

NRC COMMENT

During an NRC inspection conducted from August 21, 1994 through September 17, 1994, 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.

Unit 1 License Condition 2.D.(3).u and Unit 2 License Condition 2.C.(23) require that the licensee implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the Safety Evaluation Report dated February 1979. The North Anna Updated Final Safety Analysis Report, Section 9.5.1.6.3 states that the penetration fire barriers are subject to periodic inspections and defines fire barrier penetrations to include dampers.

Contrary to the above, from June 28, 1991, to August 25, 1994, no fire damper inspections were performed.

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 the misinterpretation of the original Technical Specifications Surveillance Requirements for penetration fire barriers as not to include fire dampers. Contributing to this misinterpretation was a lack of clearly defined inspection requirements. The inspection requirements were ultimately eliminated as the result of their relocation initially from the Technical Specifications to the UFSAR, and later to the Technical Requirements Manual.

The original Technical Specifications Limiting Conditions for Operation (LCO) 3.7.15 contained penetration fire barrier descriptions which were inconsistent between Unit 1 and Unit 2. The Unit 2 requirements were more descriptive in that a parenthetical statement was included which further defined penetration fire barriers to include cable penetration barriers, fire doors, and fire dampers while the Unit 1 LCO requirements described only penetration fire barriers. This inconsistency of the Technical Specifications Surveillance Requirements resulted over time in the inadvertent elimination of the requirement.

When the fire protection Limiting Conditions of Operation and Surveillance Requirements were relocated from the Technical Specifications to the UFSAR in accordance with Generic Letter 88-12 on June 5, 1990, a new Section SR 16.2. was added to the UFSAR. This section contained the surveillance requirement for "penetration fire barriers" but stated it in a manner similar to the Unit 1 Technical Specification, omitting the parenthetical statement which clarified penetration fire barriers. Thus, the visual inspection of the fire protection dampers was not explicitly stated as a surveillance requirement in the UFSAR, although the clarifying parenthetical information was contained elsewhere in the UFSAR. However, when UFSAR Section SR 16.2 was subsequently relocated to the Technical Requirements Manual (TRM) in March 1994, the surveillance requirement was revised to require visual inspection of "penetration seals" rather than "penetration fire barriers," based on an incorrect interpretation that the two phrases were functionally equivalent.

Additionally, in response to a Notice of Violation documented in NRC Inspection Report 92-18, in which a failure to establish an adequate fire barrier inspection procedure was identified, the then existing procedure (1-PT-105.1.4) was deleted. A new procedure was issued to address the inspection of penetration barriers. Records indicate that the visual inspection requirement to verify the position of the damper was to be separated from the new fire barrier inspection procedure and incorporated into a separate new damper inspection procedure. The existing fire damper inspection criteria and damper identification methods in the previous procedure were identified as deficient. However, an internal commitment was not established for the preparation and implementation of the damper inspection procedure prior to the deletion of the existing procedure.

Since the visual inspection of fire dampers was not unambiguously stated as an UFSAR surveillance requirement, as discussed above, this procedure was not completed..

Concurrent with the fire barrier procedure revisions, an internal self assessment performed in December 1992 identified an enhancement item that included the functional testing of the fire dampers required for Appendix R. The development of the enhanced visual inspection procedure was combined with the functional testing for dampers and tracked internally without recognition of the Technical Specifications Surveillance Requirement for visual inspections. Procedure development was ongoing when it was determined that the visual inspection of the fire dampers was missed. Due to the misinterpretation of UFSAR surveillance requirements, the proper priority was not placed on the development of the new damper inspection procedure which also contributed to the missed surveillance.

It should be noted that this deficiency was identified during a Quality Assurance Fire Protection audit that was performed in 1994.

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

Following the discovery of the missed surveillance, Periodic Tests 1 and 2-PT-105.1.5 were developed and successfully performed to document the visual inspection of fire dampers in safety related areas. These inspections were completed within the 24 hours from the time the missed surveillance was recognized.

An engineering review team was established following the discovery of the missed surveillance to determine the cause of the event and to suggest recommended corrective actions to prevent recurrence. Recommended corrective actions will be reviewed and approved by management as appropriate.

A change to the Technical Requirements Manual was approved to add surveillance requirements to verify that fire dampers are to be functional by a visual inspection every 18 months and prior to declaring a damper operable following maintenance.

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

A review of the Technical Requirements Manual surveillance requirements in the fire protection area and associated implementing test procedures is currently being performed and will be completed by December 15, 1994. A

cross reference between the Technical Requirements Manual surveillance requirements and associated implementing procedures will be developed to assure that all required testing is documented.

A review of the original fire protection surveillance requirements from the Technical Specification and UFSAR will be performed by March 31, 1995, to ensure possible discrepancies or misinterpretations are properly identified. The TRM and supporting documents will be enhanced as necessary based on this review.

4. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when periodic tests 1 and 2-PT-105.1.5 were developed and successfully performed to document the visual inspection of fire dampers in safety related areas.