

Vepco

VIRGINIA ELECTRIC AND POWER COMPANY

NORTH ANNA POWER STATION

P. O. BOX 409

MINERAL, VIRGINIA 23117

10 CFR 50.73

July 26, 1991

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

Serial No. N-91-018
NAPS: WCH
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

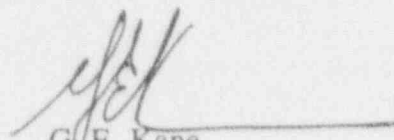
Dear Sirs:

The Virginia Electric and Power Company hereby submits the following Licensee Event Report applicable to North Anna Units ¹ and 2.

Report No. 91-014-00

This Report has been reviewed by the Station Nuclear Safety and Operating Committee and will be forwarded to the Corporate Management Safety Review Committee for its review.

Very Truly Yours,


G. E. Kane
Station Manager

Enclosure:

cc: 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

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555; AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)										DOCKET NUMBER (2)										PAGE (3)									
NORTH ANNA POWER STATION UNITS 1 & 2										0 5 0 0 0 3 3 8										1 OF 0 3									
TITLE (4)																													
FAILURE TO MEASURE INLET PRESSURE FOR BORIC ACID TRANSFER PUMP SURVEILLANCE TESTS																													
EVENT DATE (6)						LER NUMBER (6)						REPORT DATE (7)						OTHER FACILITIES INVOLVED (8)											
MONTH		DAY		YEAR		SEQUENTIAL NUMBER		REVISION NUMBER		MONTH		DAY		YEAR		FACILITY NAMES						DOCKET NUMBER(S)							
																NORTH ANNA UNIT 2						0 5 0 0 0 3 3 9							
0 7		0 3		9 1		9 1		0 1 4		0 0		0 7		2 6		9 1								0 5 0 0 0					
OPERATING MODE (9)						THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)																							
1						20.402(b)						20.405(c)						50.73(a)(2)(iv)						73.71(b)					
POWER LEVEL (10)						20.406(a)(1)(i)						50.36(a)(1)						50.73(a)(2)(v)						73.71(c)					
1 0 0						20.406(a)(1)(ii)						50.36(a)(2)						50.73(a)(2)(vi)						OTHER (Specify in Abstract below and in Text, NRC Form 365A)					
						20.406(a)(1)(iii)						X 50.73(a)(2)(i)						50.73(a)(2)(viii)(A)											
						20.406(a)(1)(iv)						50.73(a)(2)(ii)						50.73(a)(2)(viii)(B)											
						20.406(a)(1)(v)						50.73(a)(2)(iii)						50.73(a)(2)(ix)											
LICENSEE CONTACT FOR THIS LER (12)																													
NAME																				TELEPHONE NUMBER									
G. E. Kane, Station Manager																				AREA CODE									
																				7 0 3 8 9 4 - 2 1 0 1									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																													
CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRCDS		CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRCDS											
SUPPLEMENTAL REPORT EXPECTED (14)																				EXPECTED SUBMISSION DATE (15)									
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO										MONTH DAY YEAR									

ABSTRACT (Limit to 7400 spaces - i.e. approximately fifteen single-space typewritten lines) (16)

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
NORTH ANNA POWER STATION UNITS 1 & 2	05000338	91	014	00	02	OF	03

TEXT (If more space is required, use additional NRC Form 366A's) (17)

1.0 Description of the Event

On July 3, 1991 with Units 1 and 2 in Mode 1 at 100 percent power it was determined that ASME Section XI surveillance requirements for the four boric acid transfer pumps (EIIIS System Identifier CB, Component Identifier P) had not been adequately performed during the second quarter of 1991. A review of Generic Letter 89-04, IST Program Revision 6, and implementing test procedures was being made in accordance with the action plan of LER N1-91-009-00 to ensure no other deficiencies exist. During this review, it was determined that the requirements for measuring inlet pressure from permanent instrumentation was not incorporated into the applicable test procedures. The IST Program requires that boric acid transfer pump inlet pressures be directly measured after April 3, 1991; however, the implementing procedures required the inlet pressure to be calculated from tank level. Since the IST Program is developed to maintain compliance with ASME Section XI, this incident is a violation of Technical Specification 4.0.5. Therefore, this event is reportable pursuant to 10CFR50.73 (a)(2)(i)(B).

2.0 Significant Safety Consequences and Implications

This incident posed no significant safety implications because the pumps were still capable of performing their intended safety functions of providing flow to the charging pump (EIIIS System Identifier CB, Component Identifier P) suction header. Also, the pumps demonstrated the capability of circulating boric acid solution through the boric acid storage tanks (EIIIS System Identifier CB, Component Identifier TK) at near shutoff head. After performing additional tests with temporary pressure instrumentation, it was determined that the previous inlet pressure calculations were conservative. Therefore, the health and safety of the public were not affected at any time during this incident.

3.0 Cause of the Event

The cause of the event was personnel error resulting in failure to obtain the appropriate relief from test requirements when difficulty was encountered with the installation of the pressure gages. IST personnel had referred to a letter titled "Interim Evaluation for Pump and Valve Inservice Testing Program" submitted by the NRC to North Anna Power Station on June 9, 1988. Based on this letter, IST personnel were under the impression that calculation of the inlet pressure was "equivalent" to measuring inlet pressure. However, the letter also states that prior relief from directly measuring inlet pressure must be obtained. The appropriate relief from measuring inlet pressure had been removed from the IST program in January of 1989 when the program was revised to require measurement of inlet pressure after completion of pressure gage installation.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (5)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
NORTH ANNA POWER STATION UNITS 1 & 2	0 5 0 0 0 3 3 8 9 1	—	0 1 4	—	0 0	0 3 OF 0 3	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

4.0 Immediate Corrective Actions

Boric acid transfer pump inlet pressure reference points were measured on July 5 and 6 using a temporary test gage, and new ASME XI acceptance criteria was generated using the reference data.

5.0 Additional Corrective Actions

The appropriate implementation procedures were revised to incorporate the new acceptance criteria and to include steps for recording inlet pressure from either the permanent gages or temporary test gages.

6.0 Actions to Prevent Recurrence

A review of Generic Letter 89-04, IST Program Revision 6, and implementing test procedures has been completed, and other potential deficiencies in the program implementation have been documented. An action plan is currently being developed to enhance IST Program requirements to ensure future revisions to the program and/or impacts from regulatory correspondence are compared and implementing test procedures are revised as necessary.

7.0 Similar Events

Similar recent Licensee Event Reports (LER) involving missed surveillances due to personnel error were as follows:

- | | |
|------------------|--|
| LER N1-90-010-00 | Failure to perform monthly and quarterly IST Surveillances of Auxiliary Feedwater Pumps and Valves as well as monthly surveillance channel checks for Auxiliary Feedwater Flow Rate Accident Monitoring Instrumentation. |
| LER N1-91-006-00 | Failure to perform the eight hour surveillance for operability of the A.C. Off-site Power Sources. |
| LER N1-91-009-00 | Failure to perform IST Surveillances of three main steam check valves, one safety injection trip valve and six seal water supply valves to the control room chilled water pumps. |
| LER N1-91-013-00 | Failure to perform closed stroke time surveillances of four quench spray pump motor operated valves in the IST Program. |

8.0 Additional Information

None