

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

March 6, 1984

Mr. James P. O'Reilly  
Regional Administrator  
Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30303

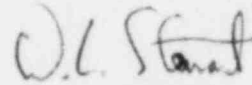
Serial No. 090  
NO/JLH:acm  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of February 7, 1984, in reference to the inspection conducted at North Anna Power Station between December 6, 1983 and January 5, 1984 and reported in IE Inspection Report Nos. 50-338/83-31 and 50-339/83-31. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

  
W. L. Stewart

Attachment

cc: Mr. James R. Miller, Chief  
Operating Reactors Branch No. 3  
Division of Licensing

Mr. M. W. Branch  
NRC Resident Inspector  
North Anna Power Station

8403290260 840316  
PDR ADOCK 05000338  
Q PDR

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-338/83-31 AND 50-339/83-31

NRC COMMENT:

1. Technical Specification 4.7.15a requires that each fire barrier protecting safety related areas be verified functional by a visual inspection at least once per 18 months.

Contrary to the above, the fire barriers between the rooms that house the auxiliary feedwater pumps have not been visually inspected every 18 months, and were not included as part of the 18 month inspection program.

This is a Severity Level IV Violation (Supplement 1), and applies to Units 1 and 2.

RESPONSE:

- (1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

- (2) REASONS FOR VIOLATION:

The auxiliary feedwater pumphouses were incorrectly identified as a fire zone that included the cubicles for both the steam driven and the electrically driven auxiliary feedwater pumps. Therefore, the wall that separates the cubicles was not considered a fire barrier.

- (3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

The wall in question was classified as a fire barrier and the cubicles reclassified as separate fire areas. The inspection procedure was revised to include an inspection of this wall.

As noted in the narrative to the Inspection Report, this event was initiated by an apparent breach in the wall in question. This breach was sealed and the wall was inspected to ensure the barrier was no longer compromised.

- (4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Due to recent interpretation and definition changes initiated by the issuance of 10 CFR 50 Appendix R and subsequent regulatory correspondence, the specific fire areas have been reexamined and newly designated as required to be consistent with the regulations.

- (5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The corrective actions have been completed.

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-338/83-31 AND 50-339/83-31

NRC COMMENT:

2. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained.

Contrary to the above, 1-PT-105.1.4 was not current in that, the inspection of the wall between the auxiliary and fuel buildings (Page 1 of 22 of Attachment 6.1-C of 1-PT-105.1.4) was not deleted as approved by the Station Nuclear Safety and Operating Committee. In addition, the Unit 2 Auxiliary Shutdown Panel emergency and abnormal procedures were not current in that 2-EP-1,2,3,4 and 5 and 2-AP-1.4, 1.5, 4 and 5 were not the latest revision.

This is a Severity Level IV Violation (Supplement 1), and applies to Units 1 and 2.

RESPONSE:

- (1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

- (2) REASONS FOR VIOLATION:

Both examples noted were due to administrative errors.

The improper distribution of a revision to the fire zone inspection procedure to delete the Fuel Building to Auxiliary Building block wall was a oversight by Station Records clerical personnel.

The improper revisions to the Auxiliary Shutdown Panel procedures were due to the inaccessibility of the panel to other than Operations personnel. The Operations Department Administrative staff received copies of the revisions but did not realize their responsibility to replace the superceded copies in this location.

- (3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

A corrected distribution to the inspection procedure was made to delete the page in question. The Auxiliary Shutdown Panel procedures were immediately replaced with the correct revisions.

- (4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Operations and administrative support department personnel were reinstructed on the importance of their activities and their responsibilities.

- (5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The corrective actions have been completed.