

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

February 4, 1992

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

Serial No. 92-029
NAPS/JHL:R8
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. 50-338/91-26 AND 50-339/91-26
RESPONSE TO THE NOTICES OF VIOLATION

We have reviewed your letter of January 6, 1992, which referred to the inspection conducted at North Anna from November 3, 1991 to December 7, 1991, and reported in Inspection Report Nos. 50-338/91-26 and 50-339/91-26. Our response to the Notices of Violation is attached.

In your letter that transmitted the Notices of Violation, you expressed concern about Violation A, which involved two valves that are required to be locked in position that were found unlocked, because it appears to be indicative of continuing problems with operator inattentiveness to detail. We are in agreement that this issue requires additional management attention.

Although recent operator personnel error trends are favorable, we believe that there continues to be room for improvement. Because of our sensitivity to this issue, we have elected to use our Quality Assurance (QA) Department in an assistance role. It is our intent to use this organization to witness the performance of safety related independent verification activities. We expect that this will not only add an additional layer of defense to our independent verification program, but will also raise the awareness of the operations personnel.

You also expressed concern with Violation B, which involved an apparent misapplication of a test procedure used to conduct testing on an operable safety related system and the failure to perform an activity screening checklist, which bypassed the program for ensuring that tests do not involve an unreviewed safety question.

The newly revised Design Change Package (DCP) process requires that an activity screening be performed and attached to the DCP which will prevent any further misunderstanding about the review process for modifications and ensure that an evaluation is made for unreviewed safety questions. Also, the use of test procedures has been revised to require a 10 CFR 50.59 Activity Screening if the test procedure is not part of an approved modification package.

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
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

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

RESPONSE TO THE NOTICES OF VIOLATION
REPORTED DURING THE NRC INSPECTION CONDUCTED
BETWEEN NOVEMBER 3, 1991, AND DECEMBER 7, 1991
INSPECTION REPORT NOS. 50-338/91-26 AND 50-339/91-26

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on November 3, 1991 - December 7, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1991), the violations are listed below:

- A. Technical Specification 6.8.1.a requires written procedures to be established, implemented and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, to include operating procedures. Operating Procedures 1-OP-63A, Valve Checkoff-Containment Atmosphere Cleanup, and 1-OP-23.3, Process Vent System, respectively require that valves 1-HC-40 and 1-GW-135 be locked.

Contrary to the above, on November 19, 1991, valve 1-H-C-40 (1-HC-40) was found to be unlocked, and on December 4, 1991, valve 1-GW-135 was found to be unlocked.

This is a Severity Level IV Violation applicable to Unit 1 only (Supplement I).

- B. Technical Specification 6.8.1.a requires written procedures to be established, implemented and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, to include administrative procedures. Administrative Procedure ADM 3.7, Engineering Work Requests, requires Station Engineering to prepare an Activity Screening Checklist for Engineering Work Requests to determine if a safety evaluation is required. VPAP-0102, Station Nuclear Safety and Operating Committee (SNSOC), requires the SNSOC to review surveillance and testing procedures for safety-related equipment and that written approval or disapproval be certified in writing by the SNSOC Chairman or Vice Chairman.

Contrary to the above, on November 24, 1991, test activities were performed on the Unit 2 Safeguards Area Ventilation System in accordance with Engineering Work Request 90-381 without any Activity Screening Checklist having been completed, as required by ADM 3.7, and with the use of a specific test procedure which was not reviewed and approved by the Station Nuclear Safety and Operating Committee as required by VPAP-0102.

This is a Severity Level IV Violation applicable to Unit 2 only (Supplement I).

RESPONSE TO VIOLATION A

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The reason for the improper attachment and/or locking of the valves was due to lack of attention to detail by Operations Department personnel. In the case of valve 1-HC-40, on the Containment Atmosphere Cleanup System, the chain to lock the valve in position was incorrectly attached. In the case of valve 1-GW-135, on the Process Vent System, the valve was correctly chained and the lock was applied through the chain. However, the hasp on the lock was not properly engaged.

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

1-GW-135 and 1-HC-40 were verified to be in their proper position.

The lock on valve 1-GW-135 was securely locked and the chain on valve 1-HC-40 was adjusted and the valve properly locked.

A walkdown of locked valves in the vicinity of the two valves that were found unlocked was performed. No discrepancies were identified.

A coaching session was held with operations personnel to stress the importance of attention to detail and self checking when locking valves in position, and appropriate disciplinary action has been taken with the individuals involved.

Additionally, we have elected to use our Quality Assurance (QA) Department in an assistance role. It is our intent to use this organization to witness the performance of safety related independent verification activities. We expect that this will not only add an additional layer of defense to our independent verification program, but will also raise the awareness of the operations personnel. This effort will be continued until station management is satisfied that the operation performance meets that required high standards.

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

No further corrective actions are required.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

RESPONSE TO VIOLATION B

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by inappropriately using Engineering Work Request (EWR) 90-381 and Test Engineering procedure 0-NAT-M-001 (Mechanical Functional Loop Checkout) to perform test activities on the Safeguards Area Ventilation System (SAVS). Specifically, personnel did not adequately review EWR 90-381, which was being used as a guideline to air flow balance the operable SAVS, without first performing an Activity Screening Checklist to determine if a safety evaluation was required. EWR 90-381 did not direct that work be performed, but was used to provide guidance to balance the ventilation system in accordance with approved station procedures and drawings. Also, 0-NAT-M-001 was used with write-in steps to perform an air flow balancing of the operable SAVS without obtaining prior SNSOC approval.

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

Upon discovery of the inadequate document review, testing was stopped. Technical Specification compliance was verified using Periodic Test procedures 2-PT-77.2A and B, and a station deviation report was written. An EWR addendum (EWR 90-381A) was later issued with a SNSOC approved work procedure and activity screening.

The SAVS was air flow balanced to its original design flows.

The newly revised Design Change Package (DCP) process requires that an activity screening be performed and attached to the DCP which will prevent any further misunderstanding about the review process for modifications and ensure that an evaluation is made for unreviewed safety questions.

The use of test procedures has been revised to require a 10 CFR 50.59 Activity Screening if the test procedure is not part of an approved modification package.

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

The new requirement to perform a 10 CFR 50.59 Activity Screening for test procedures that are not part of an approved modification package is expected to resolve this issue. However, additional followup by engineering management will verify this.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.