

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 12, 1992

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

Serial No. 92-714
MPW/EJW
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
FIRE DETECTION INSTRUMENTATION TESTING
SPECIAL REPORT

Pursuant to Updated Final Safety Analysis Report (UFSAR) Technical Requirement 16.2.1.1.A.2.2, a Special Report is required because the Reactor Coolant Pump (RCP) non-supervised circuits between the local panels and the Control Room (CR) fire panel have not been demonstrated operable every 31 days as required. The missed UFSAR Surveillance Requirement (SR) 16.2.1.1.1 for inside containment non-supervised circuits was identified during Quality Assurance Audit 92-15 and is a result of inadequate implementation of the original system testing requirements.

A review of fire protection testing procedures indicated that the RCP heat detection panel annunciation circuits were originally believed to be supervised because the heat detection device initiation circuits are supervised. Supervised circuits only require a six month test frequency. As such, the RCP heat detector panel annunciation circuits to the CR fire panel were being tested while performing channel functional tests on a six month frequency instead of the required 31 day frequency. A later change revised the channel functional test frequency from every six months to cold shutdown and did not specifically change the annunciation circuit testing.

Currently the resistance temperature detectors (RTD) for the RCP motors are being monitored as the alternative method identified in the UFSAR for monitoring RCP fire conditions. Because of the associated personnel safety risks involved with frequent containment entry, the RCP RTDs will continue to be used to satisfy the UFSAR requirements until resolution of corrective actions can be completed.

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Evaluations are being performed to consider the following test options:

1. Revising the UFSAR to delete or revise the frequency of testing.
2. Modifications to change the circuit to a supervised circuit thereby changing the test frequency to 6 months and allowing testing from outside containment.
3. Development of an alternative test method to verify operability.

Based upon the results of these evaluations, suitable corrective measures will be determined and implemented as appropriate.

In addition to the review of the specific concern of RCP heat detection circuit testing, UFSAR Section 16.2.1 will be revised as necessary to clarify the intent of the section which will preclude further misinterpretation.

This Special Report has been reviewed by the Station Nuclear Safety and Operating Committee and will be provided to the Management Safety Review Committee.

Should you have any questions regarding this report, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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