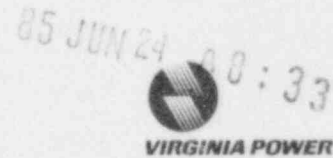


June 20, 1985



Dr. J. Nelson Grace
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

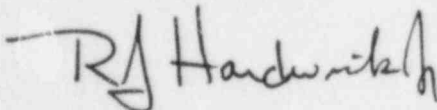
Serial No. 85-400
NO/jhl:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

We have reviewed your letter of May 22, 1985, in reference to the inspection conducted at North Anna Power Station from April 1 to May 5, 1985, and reported in IE Inspection Report Nos. 50-338/85-12 and 50-339/85-12. Our response to the Notice of Violation and the Notice of Deviation are addressed in the attachment.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power 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. Roger D Walker, Director
Division of Project and Resident Programs

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

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

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RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM APRIL 1 TO MAY 5, 1985
REPORT NOS. 50-338/85-12 AND 50-339/85-12

NRC COMMENT:

Technical Specification surveillance requirement 4.8.2.3.2 requires in part that each 125 volt battery be verified OPERABLE at least once per seven days by ensuring the electrolyte level of each pilot cell is between the minimum and maximum level indication marks. 2-PT-85 (D.C. Distribution System) is the procedure the licensee uses to verify the requirements of Technical Specification surveillance 4.8.2.3.2. Step 5.2 of 2-PT-85 requires that individual performing the procedure verify electrolyte of the pilot cells is between the maximum level and one inch below that level.

Contrary to the above, when 2-PT-85 was performed on April 30, 1985, the electrolyte levels were initialed as satisfactory when, in fact, electrolyte level for the pilot cell on at least one battery (2-II) was above the maximum level indication mark.

This is a Severity Level IV Violation (Supplement 1) for Unit 2.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is not correct as stated.

2. REASON FOR THE VIOLATION:

The electrician performing 2-PT-85, on April 30, 1985, initially found the electrolyte level in the pilot cells of batteries 2-I, 2-II, 2-III, and 2-IV at a level slightly above the upper fill level mark due to gas buildup. The electrician then degassed the batteries by tapping on the casing and the levels returned to within the acceptance criteria of 2-PT-85. This situation had occurred previously and the vendor (C & D Batteries, Inc.) had suggested the above degassing method as an acceptable technique.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

After notification by the NRC Resident Inspectors, the batteries were reinspected. The pilot cell level on Battery 2-I was found to be slightly above the upper fill mark (less than one-eighth inch). The remaining battery cells were also inspected and several were found to be slightly high (less than one-quarter inch).

The slightly high levels were returned to within the acceptable range. The vendor was contacted and advised that, even though cell electrolyte levels were slightly high, no operational or performance problems would exist.

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

To address the concerns raised in IEIR 85-05 and 85-12 on battery surveillance and maintenance, additional training will be provided to the electricians performing battery surveillance and procedures will be augmented.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Station electricians will be instructed and 1/2-PT-85 will be revised by August 1, 1985.

RESPONSE TO NOTICE OF DEVIATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM APRIL 1 TO MAY 5, 1985
REPORT NOS. 50-338/85-12 AND 50-339/85-12

NRC COMMENT:

Section 15.2.11 of the North Anna Updated Final Safety Analysis Report (UFSAR) states, "excessive loading by the operator or by system demand would be limited by the turbine load limiter".

Correspondence with Westinghouse indicated that the turbine governor valve position limiter was the load limiter discussed in the UFSAR.

Contrary to the above, excessive loading by the operator or system demand was not limited by the turbine load limiter, in that plant operating procedures 1(2)-OP-2.1 set the governor valve position limiter to the maximum setting allowing reactor power to increase above the maximum designed power.

This deviation applies to North Anna 1 and 2.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED DEVIATION:

This deviation is correct as stated with the following clarification:

The maximum governor valve position limiter would allow turbine power to increase above 100% rated load. Reactor power increases would have been limited to by the reactor protection system within the limits assumed in the UFSAR.

2. REASON FOR THE DEVIATION:

1/2-OP-2.1 did not address the valve position limiter as the 100% load limiter as described in UFSAR Section 15.2.11.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The initial action by station management as a result of this deviation was to provide instructions to operating crews to set the turbine governor valve position limiter to a value of 2% above the 100% reactor power governor valve position.

1/2-OP-2.1 has been revised to incorporate setting the valve position limiter to 2% above the point at which the valve position limiter red light illuminates.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS:

The revision to 1/2-OP-2.1 is described in paragraph 3.

UFSAR Section 15.2.11.1 will be revised to delete the reference to the turbine load limiter. The load limiter is a turbine control feature that is not required for reactor protection.

Frequent adjustments of the valve position limiter would increase the probability of misadjustment of the valve position limiter, which could cause large turbine load swings. Continued use of the valve position limiter as described in paragraph 3 above may not be prudent. If frequent valve position limiter readjustments or the current setting causes other turbine operational problems, the value may be adjusted.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

A UFSAR change will be initiated to revise UFSAR Section 15.2.11 by September 1, 1985.