

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

65 SEP 23 A 9:23
September 19, 1985

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

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

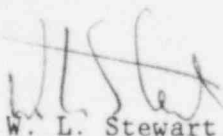
Serial No. 85-626
NAPS/JHL:cfm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

We have reviewed your letter of August 21, 1985, in reference to the inspection conducted at North Anna Power Station from July 8 to August 4, 1985, and reported in IE Inspection Report Nos. 50-338/85-18 and 50-339/85-18. Our response to the Notice of Violation is addressed in the attachment.

We have determined that no proprietary information is contained in the report. Accordingly, Vepco 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. Edward J. Butcher, Acting 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 JULY 8 TO AUGUST 4, 1985
INSPECTION REPORT NOS. 50-338/85-18 AND 50-339/85-18

NRC COMMENT:

Unit 1 and Unit 2 Technical Specification (TS) 4.8.1.1.3a specify a number of surveillance requirements that are to be performed at least once per seven days. 1 and 2-PT-85, DC Distribution Systems, are the performance tests the licensee uses to satisfy the above requirements. Unit 1 and Unit 2 TS 4.0.2 require, in part, that each surveillance requirement be performed within the specified interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

Contrary to the above, the surveillance intervals for 1 and 2-PT-85 were exceeded in that the tests were performed on July 9, 1985, and were not performed again until July 19, 1985.

This is a Severity Level V violation (Supplement I) and applies to both Units.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

2. REASONS FOR THE VIOLATION:

The Performance and Test Group provides each department with a weekly schedule of the periodic tests (PT) due for the following ten days. From this schedule, each department extracts information from the ten day list and determines the daily departmental schedule. It is the individual departments responsibility to perform the PT during the surveillance interval. When the surveillance is performed the signed-off PT should be forwarded to the Performance Engineer, by Thursday afternoon, to update the next week's surveillance schedule.

1 and 2-PT-85 were not forwarded to the Performance Engineer until the following week because they had to receive Station Nuclear Safety and Operating Committee (SNSOC) approval due to procedure deviations. (Procedure deviations are reviewed by SNSOC in accordance with the Technical Specifications.) Also, the Electrical Supervisor did not notice that 1 and 2-PT-85 were, missing from the plan of the day. The added time required to receive SNSOC approval of the deviated PT prior to forwarding to the Performance Engineer resulted in the PT schedule not being updated for the following schedule period. This type

of missed commitment would not likely have occurred for PTs that are performed less frequently than once every two weeks.

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

1 and 2-PT-85 were performed satisfactorily following the identification of the missed surveillance interval.

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

The Electrical Department will be responsible for performing a closer review of the plan of the day against the weekly PT schedule to ensure that PT surveillances are properly scheduled.

In addition, the Performance Engineer within the Performance and Test Group will assist the Maintenance Department in recommending possible improvements in the scheduling of weekly periodic tests.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The Performance Engineer will provide recommendations, as applicable, for improving the scheduling of periodic tests to the Maintenance Department by November 1, 1985.