

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

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W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

September 27, 1985

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

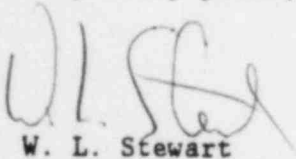
Serial No. 85-604  
NAPS/JHL  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Dr. Grace:

We have reviewed your letter of August 13, 1985, in reference to the inspection conducted at North Anna Power Station from July 8 to 12, 1985, and reported in IE Inspection Report Nos. 50-338/85-19 and 50-339/85-19. Our responses to the Notices of Violation are addressed in the attachment. Per a telephone conversation on September 13, 1985 between Mr. D. A. Sommers (VEPCO) and Mr. V. L. Brownlee (NRC), an extension until September 27, 1985 was granted to respond to the Notices of Violation.

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

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PDR ADDCK 05000338  
Q PDR

IE01

VIRGINIA ELECTRIC AND POWER COMPANY TO

Dr. J. Nelson Grace

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

RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED FROM JULY 8 TO JULY 12, 1985  
INSPECTION REPORT NOS. 50-338/85-19 AND 50-339/85-19

NRC COMMENT:

1. Unit 1 Technical Specification Table 4.3-14, Item 2, requires a channel functional test of the waste gas holdup system explosive gas monitoring system every 31 days. Technical Specification 4.0.2.b states that the total maximum combined interval time for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval, or 100.75 days for a 31 day requirement.

Contrary to the above, 1-PT-45.9.3, Waste Tank Outlet Oxygen Test, which implements a portion of the above surveillance requirement, was performed on December 20, 1984, January 23, 1985, February 27, 1985, and April 2, 1985, or 103 days for three consecutive intervals.

This is a Severity Level V violation (Supplement I). This violation applies to Unit 1 only.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

2. REASONS FOR THE VIOLATION:

The scheduling error for performing 1-PT-45.9.3 was apparently caused by a computer problem which allowed a grace period of seven days when no grace period should have been allowed.

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

The computer program was reviewed and an attempt was made to recreate the scheduling error of 1-PT-45.9.3 but the attempt was unsuccessful.

To ensure that all other periodic tests were not incorrectly scheduled a check by hand was performed for the subsequent two weeks after this incident occurred. No problems during this review were noted.

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

A monthly review will be performed to check the periodic test schedule

and its accuracy. This review will be conducted until either the the computer problem can be resolved or a new station scheduling program can be developed.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved by the implementation of the monthly review.

RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED FROM JULY 8 TO JULY 12, 1985  
INSPECTION REPORT NOS. 50-338/85-19 AND 50-339/85-19

NRC COMMENT:

2. 10 CFR 50, Appendix B, Criterion II, and the Quality Assurance program (VEP 1-4A) require that activities affecting quality be accomplished under suitably controlled conditions, including suitable environmental conditions for accomplishing this activity.

Contrary to the above, adequate measures have not been established to assure suitable environmental conditions for the calibration of measuring and test equipment (M&TE). Specific limits based on vendor specifications or other sources defining acceptable environmental conditions have not been established for the calibration of M&TE in the electrical shop (ETEC) and physical shop (PTEC) calibration facilities.

This is a Severity Level V violation (Supplement I).

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated in that vendor recommendations for environmental controls were not specifically established by procedures.

2. REASONS FOR THE VIOLATION:

The North Anna electronic calibration lab (ETEC), which controls instrumentation and control M&TE, and the physical calibration lab (PTEC), which controls mechanical M&TE, are each defined as an Echelon III Laboratory by the Instrument Society of America (ISA). The standard for an Echelon III Laboratory does not state specific environmental guidance and no specific environmental requirements are given. Therefore, specific environmental controls were not established.

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

In order to provide more specific guidance, a review was performed of the technical manuals for the NQC equipment to determine which equipment has humidity and temperature considerations. The following procedures were identified as needing revisions to include environmental conditions:

- PTEC-P-PG-1, Appendices KK, LL, NN, OO, F, N, P and R
- ETEC-P-MM-1, Appendices A, B, C, D and F
- ETEC-P-TH-1, Appendices B and C
- ETEC-P-CS-1, Appendices B, H and I
- ETEC-P-EC-1, Appendix H
- ETEC-P-OS-1, Appendices C, D, F and H

In addition, a dehumidifier has been placed in each calibration laboratory to reduce humidity.

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

The calibration procedures identified in 3 above are currently in the routing process. It is expected that these procedure revisions will be implemented by October 31, 1985.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Procedure revisions will be implemented by October 31, 1985.