DMB

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

86 FEB 13 P12:47

February 7, 1986

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. 86-041
NAPS/JHL/acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-338/85-12 AND 50-339/85-12

We have reviewed your letter of January 14, 1986, relating to our June 20, 1985 response to the Notice of Violation in Inspection Report Nos. 50-338/85-12 and 50-339/85-12. Our revised response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact me.

Very truly yours,

W. L. Stewart

cc: Mr. Roger D. Walker, Director
Division of Reactor Projects

Mr. Lester S. Rubenstein, Director
PWR Project Directorate # 2
Division of PWR Licensing - A

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

IE01

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

No further corrective actions are required.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

RESPONSE TO NOTICE OF VIOLATION
INSPECTION 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 the 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. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

After notification by the NRC Resident Inspectors, the batteries were reinspected. The pilot cell on battery 2-II 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 he advised that, even though cell electrolyte levels were slightly high, no operational or performance problems would exist.

1-PT-85 and 2-PT-85 were revised to ensure that when the electrolyte level of a pilot cell is not within the required band, the deviation is noted on the test critique sheet, a deviation report is initiated, the shift supervisor is notified, the pilot cell level is adjusted to be within the band, and all other cells of the effected battery are checked and if not within the band, noted as such on the critique sheet and deviation report and adjusted to also be within the band.

Training was provided to electricians performing battery surveillance. The training was based on the revisions to 1-PT-85 and 2-PT-85.