

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

19 July 5, 1979: 21

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Serial No.: 542  
PO/FHT:baw  
Docket No.: 50-338  
50-339  
License No.: NPF-4  
CPPR-78

Dear Mr. O'Reilly:

We have reviewed your letter of June 8, 1979, in reference to the inspection conducted at North Anna Power Station Units No. 1 and 2 on May 7-11, 1979, and reported in IE Inspection Report Nos. 50-338/79-25 and 50-338/79-34. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure.

Very truly yours,

*C. M. Stallings*

C. M. Stallings  
Vice President-Power Supply  
and Production Operations

Attachment

cc: Mr. Albert Schwencer

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RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED IN IE INSPECTION REPORT NOS.  
50-338/79-25 and 50-338/79-34

A. NRC Comment

As required by 10 CFR 50 Appendix B Criterion XI which states in part: "Test results shall be documented and evaluated to assure that test requirements have been met." This requirement is further defined in VEP-1-3A, Topical Report Quality Assurance Program Operations Phase, Section 17.2.11, and the Nuclear Power Station Quality Assurance Manual, Section 11, paragraphs 5.1.1.d., which requires "The Supervisor - Engineering Services, the Joint Test Group, and the Station Nuclear Safety and Operating Committee shall be responsible for reviewing the test results and determining if the results meet the established acceptance criteria..."

Contrary to the above, 2-PO-11.1 Component Cooling System Test At Ambient Plant Conditions, results approved January 12, 1979, indicated that the data obtained for pumps 2-CC-P-1A and 2-CC-P-1B met the acceptance criteria of paragraph 5.1. The acceptance criteria required pump flow of 8000 gpm at a 200 ft. pump head. The data indicated an unsatisfactory head of 198.7 ft. for 8000 gpm flow for each pump. This is an infraction.

A. Response

The above infraction is correct as stated. Specifically, pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 20, Code of Federal Regulation, the following information is submitted:

1. Corrective steps taken and results achieved:

The acceptance criteria of 2-PO-11.1, Component Cooling System Test at Ambient Plant Conditions, states in paragraph 5.1 that for component cooling pump 2-CC-P-1A and 2-CC-P-1B the required head is 200 feet at a flow of 8000 gpm. The acceptance criteria as stated in 2-PO-11.1, depicts the proper head for this flow to be 190 feet. It is also stated in the Specification for the Component Cooling Water Pump Equipment (NAS-124) that the design condition is 8000 gpm at 190 TDH. This information was not included in the critique of the test results.

In accordance with NPSQAM Section 17, paragraph 5.1.6, supplemental information correcting the acceptance criteria of 2-PO-11.1 will be included with the test.

2. Corrective action taken to avoid further non-compliance:

On 5-30-79, test engineers were instructed to insure the proper use of Procedure Deviations and the proper documentation of a problem or discrepancy.

3. Date when full compliance will be achieved:

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Full compliance with respect to instruction and training has been achieved. The records for 2-PO-11.1 will be corrected before August 1, 1979.

RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED IN IE INSPECTION REPORT  
NOS. 50-338/79-25 and 50-338/79-34

B. NRC Comment

As required by Technical Specification 6.8.3.c, temporary changes to surveillance procedures of safety related equipment shall be documented, reviewed by the Station Nuclear Safety and Operating Committee (SNSOC) and approved by the Station Manager within 14 days of implementation.

Contrary to the above, a temporary change to acceptance criteria step 5.3 of periodic test 1-PT-76.5 on Control Room Emergency Ventilation filter testing, conducted on March 29, 1979, was not documented, reviewed by the SNSOC, or approved by the Station Manager as of May 9, 1979.

B. Response

In regards to comment B above, after evaluation it is our opinion that we are not in violation of Technical Specification 6.8.5, temporary changes to procedures, in that the steps of the procedure were followed as stated in the procedure.

The results of 1-PT-76.5 were reviewed in accordance with the NPSQAM Section 11, paragraph 5.3, Periodic Test Program.

The results of 1-PT-76.5 were not consistent with the stated acceptance criteria, therefore, as required by paragraph 5.3.5 of Section II of the NPSQAM, the Performance Engineer notified the Engineering Supervisor of the inconsistency of 1-PT-76.5. An engineering study was initiated to evaluate the results of 1-PT-76.5. On April 24, 1979, Engineering Study 79-11 was completed and reviewed by the Engineering Supervisor. This study considers the results of 1-PT-76.5 to be satisfactory. Engineering Study 79-11 has since been approved by the SNSOC.

Since this inconsistency in the acceptance criteria constituted a condition adverse to quality, a Deviation Report should have been completed in accordance with Section 26 of NPSQAM. This Deviation Report and the engineering evaluation of the periodic test would have then been reviewed by the Station Nuclear Safety and Operating Committee.

To prevent this problem from recurring, cognizant supervisors will be instructed to inform their personnel that when an acceptance criterion for a safety related Periodic Test is not met, a Deviation Report must be submitted.

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