

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

POOR ORIGINAL

December 27, 1979

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. 1121/12079
PO/RMT:baw
Docket Nos. 50-338
50-339
License No. NPF-4
Construction Permit No. CPPR-78

Dear Mr. O'Reilly:

We have reviewed your letter of December 4, 1979, in reference to the inspection conducted at North Anna Power Station Unit Nos. 1 and 2 on October 9-November 2, 1979, and reported in IE Inspection Report Nos 50-338/79-45 and 50-339/79-54. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports 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
ITEMS REPORTED IN IE REPORT 338/79-45 AND 339/79-54

A. NRC COMMENT

As required by Unit 1 Technical Specification Table 3.3-3, Item 1.e, three steam pressure channels per operating loop are required to be operable in modes 1, 2 and 3 except as permitted by Action Statement 14. Action Statement 14 states that with the number of OPERABLE Channels one less than the Total Number of Channels, operation may proceed until performance of the next required CHANNEL FUNCTIONAL TEST (monthly), provided the inoperable channel is placed in the tripped condition within one hour.

Contrary to the above, main steam pressure transmitters for loop A, Channel IV (PT-1476) and loop C, Channel IV (PT-1497) were inoperable throughout the first cycle of Unit 1 because their sensing lines had been swapped. This was apparently done during a cutting and rewelding process under the Rework Control Program (RCF 1-350) in July, 1977.

This is an infraction.

RESPONSE

The infraction stated above is correct.

- (1) Corrective steps which have been taken and the results achieved:
 As stated in the Notice above, the sensing lines for PT-1476 (loop A) and PT-1497 (loop C) were determined to be crossed by MR N 179 1016 1510 completed October 16. This was determined to be a reportable occurrence and LER 79-14201T-0 was submitted. Maintenance Report N1-79-1108-1640 was submitted to have the sensing lines reconnected to the proper transmitters. This work was completed on 11/30/79. In order to verify that these ESF sensing lines were properly connected to the proper transmitters, 1-MP-P-PROC-04 was performed. During this investigation it was determined that sensing lines for the Loop A CCS Flow transmitters FT-1414 and FT-1415 were on different pipe tap locations on the proper loop than that which appeared on the piping drawings. This was not a problem since the proper function was being performed by the equipment. These lines were changed to comply with plant drawings. No other problems were discovered and all the ESF System Sensing line piping has been verified to be correctly connected.
- (2) Corrective steps which will be taken to avoid further noncompliance:
 Since this is considered to be an isolated incident which occurred during construction of the unit, no further corrective action is required. Additionally, Unit 2 is being reviewed.
- (3) The date when full compliance will be achieved:
 Full compliance was achieved on 11/30/79 when the steam line pressure sensing lines were correctly installed. The Unit 2 review will be completed prior to issuance of an Operating License for Unit 2.

B. NRC COMMENT

As required by Unit 1 Technical Specification 6.10.2.h, records of training and qualification for current plant staff members are to be maintained as lifetime records. The Nuclear Power Station Quality Assurance Program - Operations Phase (VEP-1-3A) commit to retention of such records in accordance with ANSI N45.2-9, 1974. This document requires a special storage repository or duplicate records systems.

Contrary to the above, records of training received by mechanical and electrical maintenance employees as part of the Mechanic Development Programs are not maintained as required. These records are not retained at the plant site and apparently one copy is maintained in the VEPCO corporate offices.

This is a Deficiency.

RESPONSE

The Deficiency stated above is correct.

(2) Corrective steps which have been taken and the results achieved:

Due to the amount of records involved, no corrective steps have been taken, thus far, to comply with stated requirements.

(2) Corrective steps which will be taken to avoid further noncompliance:

Beginning January 1, 1980, a copy of the original of the applicable records will be retained and kept in an approved location. Appropriate documentation for electrical and mechanical maintenance employees who are employed prior to January 1, 1980 will be retrieved and stored at North Anna Power Station for those employees that are in the respective development programs and working at the station on January 1, 1980.

(3) The date when full compliance will be achieved:

Full compliance will be achieved March 31, 1980.

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