

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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April 30, 1980

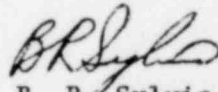
Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 104
PO/RMT:baw
Docket No. 50-338
License No. NPF-4

Dear Mr. O'Reilly:

The Virginia Electric and Power Company is hereby forwarding the attached supplemental response to our original response to IE Report No. 50-338/79-49.

Very truly yours,



B. R. Sylvia
Manager-Nuclear Operations
and Maintenance

Attachment

cc: Mr. Albert Schwencer

Response to Notice of Violation
Items Reported in IE Inspection Report
50-338/79-49

A. NRC Comment

As required by 10 CFR 50, Appendix B, Criterion V as implemented by the accepted quality assurance program, VEP 1-3A, Section 17.2.12 "A Program with applicable procedures has been established in the Nuclear Power Station Quality Assurance Manual (NPSQAM) that describes control of measuring and test instruments which includes handling of associated documents and gives the status of all items under the calibration system such as maintenance history, calibration test data, and individual log sheets assigned to each device." The NPSQAM, Section 12, Paragraph 4.3 states that the cognizant supervisor shall establish and maintain usage information of a device in the program. Section 12.4.4 of the manual states that the supervisor of the individual performing a calibration shall maintain a maintenance history record for each device in the program.

Contrary to the above, usage information had not been established and maintained for four torque wrenches (NQC 561, 526, 585, and 586) which were in the measuring and test equipment calibrating program. A complete calibration history for each device was not maintained by the cognizant supervisor.

This is a deficiency.

Response

Pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title-10, Code of Federal Regulations, the following information is submitted.

1. Corrective steps taken and results achieved:

The four torque wrenches (NQC 561, 526, 585, and 586) were removed from the electrical department where they could be used without the approval of the cognizant supervisor. The torque wrenches are presently locked up and maintained under administrative control. Prior to use, the tool is calibrated and logged out for each job on the log sheet assigned to that particular tool.

2. Corrective steps which will be taken to avoid further non-compliance:

We believe that no further corrective action is required.

3. Date when full compliance will be achieved:

The wrenches are presently under administrative control and full compliance has been achieved as of the date of this report.

4. Additional Information

One of the torque wrenches was used on Safety-Related equipment. That equipment was rechecked and found acceptable. This was the only use of these wrenches. They have since been recalibrated. This specific cognizant supervisor has an understanding of Test Equipment Control Program.

B. NRC Comment

As required by Technical Specification Section 4.0.2.a. and 4.7.14.1.1.c, the Fire Suppression Water System shall be demonstrated operable at least once per 31 days with a maximum allowable extension not to exceed 25% of the surveillance interval by verifying that each valve in the flow path is in its correct position.

Contrary to the above, periodic test procedure PT-100.3 (Fire Suppression Water System - Valve Position Verification) was not performed between 8/12/79 and 10/13/79.

This is an infraction.

Response

Pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is submitted:

1. Corrective steps taken and results achieved:

Although the periodic test procedure, 1-PT-100.3, could not be found, it was completed on 9-12-79 and the results were satisfactory as verified by the Operations Department. A "Procedure Unaccounted For" form has been initiated to account for the lost procedure.

2. Corrective steps which will be taken to avoid further non-compliance:

The "Procedure Unaccounted For" will be completed and filed in Station Records in lieu of the completed procedure. Since this is an isolated occurrence no further corrective action is required.

3. Date when full compliance will be achieved:

Full compliance will be achieved by March 14, 1980.

4. Additional Information:

The operations group verified completion of 1-PT-100.3 by review of an (unofficial) log kept by an administrative aid and by review of the posted PT schedule noting that the applicable Shift Supervisor had initialed the schedule indicating completion of this PT.

C. NRC Comment

As required by 10 CFR, 50, Appendix B, Criterion V as implemented by the accepted quality assurance program, VEP-1-3A, Section 17.2.11, the authority and responsibilities related to the test program are delineated in the Nuclear Power Station Quality Assurance Manual (NPSQAM). NPSQAM Section II, Paragraph 5.3.5 states that the cognizant supervisor and performance engineer are responsible for reviewing a periodic test (PT), including critique sheet and procedure, for completeness and accuracy.

Contrary to the above, various calculational mistakes were contained in the data sheets of PT-11 (Core Reactivity Balance) which was performed on 2/22/79; PT-20.2 (Axial Plus Difference) which was completed on 3/1/79; PT-31.1 (Delta T/T Avg Protection Channel 1 Functional Test - 1412) which was performed on 6/14/79; PT-11 which was completed on 6/18/79, and PT-24 (Calorimetric) which was performed 9/21/79. Although these documents had received two levels of review, the errors and mistakes had been identified.

This is an infraction.

Response

Pursuant to Section 2.20i of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is submitted.

1. Corrective steps taken and results achieved:

In periodic tests 1-PT-24, data was written over. The correct method for changing data is to draw a line through the erroneous data, record the correct data, then initial and date the correction. This was not done in the test performed on 9-21-79.

The trip setpoint recorded in 1-PT-31.1.1 should have been recorded as 7.429 rather than 4.429 which was the recorded value. The reset point (which is lower than the trip setpoint) was 7.301.

2. Corrective steps which will be taken to avoid further non-compliance:

A sign off line for Reactor Engineer's review will be added to procedures 1-PT-11 and 1-PT-20.2.

The person who performed 1-PT-24 dated 9-21-79, his cognizant supervisor and the performance engineer involved will be reminded of the correct procedure for correcting data.

Since the error made in 1-PT-31.1.1 was a one time event, no corrective action is planned.

3. Date when full compliance will be achieved:

Full compliance will be achieved by March 31, 1980.

4. Additional Information:

This event was emphasized to the appropriate cognizant supervisors. The Reactor Engineer was added to the review process to formalize review of these procedures.

D. NRC Comment

As required by Technical Specification 6.8.1.c, written procedures shall be established, implemented and maintained, covering the activities concerning surveillance and test of safety related equipment. Step 4.7.a of PT 75.2B (Service Water Pump, 1-SW-P-1B) states in part, "If deviations fall within the Alert Range, double the frequency of testing..." Step 5.1 of the procedure states that a flow shall be indicated in step 4.1 as an acceptance criteria.

Contrary to the above, the test results fell within the alert range when conducted on May 24, 1979, but the test frequency was not doubled. In addition, pump flow was not recorded in Step 4.1.

This is an infraction.

Response

Pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is submitted:

1. On May 24, 1979, pump flow was not recorded in Step 4.1 of 1-PT-75.28. This particular flow is recorded to verify that the check valve, 1-SW-10, is open. Check valves are only required to be cycled every 3 months. Since this is a monthly, test, the required surveillance interval was not exceeded.

Pump flow on 9-24-78 exceeded the allowable limit of 8160 gpm by 40 gpm. This flow was in the "ALERT" range which required the test frequency to be doubled which was not done. The event occurred shortly after the pump testing program was initiated. The deficiency of not doubling the test frequency when results are in the "ALERT" range was recognized and corrective steps were taken prior to this inspection.

2. Corrective steps which will be taken to avoid further non-compliance:

Since this is a one time occurrence, no further corrective action is planned.

3. Date when full compliance will be achieved:

A date of compliance is not applicable since no corrective actions are planned to be taken.

4. Additional Information:

As a point of clarification note that two different dates of performance for 1-PT-75.2B are involved as given in the body of this Inspection Report.

Testing check valve 1-SW-10 does not require significant effort and from an administrative standpoint it is more appropriate to test this valve monthly in conjunction with the service water pump testing.