



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

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JUL 1 5 1980

In Reply Refer To:
RII:AKH
50-338/80-20
50-339/80-21

Virginia Electric and Power Company
ATTN: J. H. Ferguson
Executive Vice President-Power
P. O. Box 26666
Richmond, VA 23261

Gentlemen:

Thank you for your letter of June 10, 1980 informing us of steps you have taken to correct the item of noncompliance concerning activities under NRC License Nos. NPF-4 and NPF-7 brought to your attention in our letter of May 16, 1980. We will examine your corrective actions and plans during subsequent inspections.

We appreciate your cooperation with us.

Sincerely,

R.C. Lewis
R. C. Lewis, Acting Chief
Reactor Operations and Nuclear
Support Branch

cc: W. R. Cartwright, Station Manager
P. G. Perry, Senior Resident Engineer

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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 10, 1980 JUN 12 4 3: 02

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

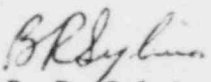
Serial No. 463
NO/RMT:ms
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of May 16, 1980, in reference to the inspection conducted at North Anna Power Station on April 21 through 25, 1980, and reported in IE Inspection Report Nos. 50-338/80-20 and 50-339/80-21. Our response to the specific infraction is attached.

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

Very truly yours,


B. R. Sylvia
Manager-Nuclear Operations
and Maintenance

Attachment

cc: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3

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RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED IN IE INSPECTION REPORT NO.
50-338/80-20 AND NO. 50-339/80-21

NRC COMMENT

As required by 10 CFR 50 Appendix B Criteria XI as implemented by the Topical Quality Assurance Report VEP-3-A Section 17.2.11 written test procedures shall incorporate the requirements contained in applicable design documents. The Nuclear Power Station Quality Assurance Manual, section 11, paragraph 2.1 further requires that tests during the preoperational period shall demonstrate performance in accordance with design intent as described in the FSAR. FSAR section 6.3.1.3.5 (i) and FSAR comment 7.4 both identify the design feature which requires two separate operator actions to reset any engineered safeguards features (ESF) actuation causing equipment to revert to its normal mode of operation.

Contrary to the above, the North Anna Unit 1 preoperational test program had no provision to test the ESF reset design to assure its operation as described in FSAR section 7.3.1.3.5 (i) and FSAR comment 7.4.

This is an infraction.

RESPONSE

The above infraction is correct as stated.

In accordance with your inspection report the following addresses corrective steps taken or planned to insure that all equipment will respond to Engineering Safeguards Feature actuation resets according to the design criteria identified in the FSAR.

On November 6, 1979, during a review of system operation subsequent to a unit trip and safety injection actuation, it was discovered that certain safety-related equipment returned to their non-safety mode upon reset of an ESF actuation signal. This condition was reported to the NRC for Unit 1 pursuant to Technical Specification 6.9.1.8.1 and for Unit 2 pursuant to 10 CFR 50.55 (e). At that time a review of drawings for all systems serving safety-related functions was immediately initiated to determine if any other deficiencies existed.

This review was performed by both Stone and Webster Engineering Corporation and Vepco. All reviews have been completed and all discrepancies have been identified and reported to the NRC.

The following deficiencies in Engineered Safety Feature reset controls were discovered and reported to the NRC during the review of drawings by Stone and Webster and Vepco.

By not modifying these valve circuits, there will be no reduction in safety. Although these valves do return to their non-safety mode following reset of CDA, the containment isolation valves, which are in series with the SW valves, will remain closed thereby preventing the service water post accident flow path from being affected by the resetting of the CDA signal. The flow diagram for this system is shown on Figure NIF FIG. 9.2.2-4 of the FSAR.

3. The auxiliary feedwater pump turbine steam supply valves open upon receipt of the SI signal. The SI open signal is removed when SI is reset, however, the valves remain open because the tripping of the main feedwater pumps on an SI signal would "seal in" the trip valves. This causes the valves to remain open when the SI signal is reset. This condition has not been reported to the NRC since the valves remain in their safety mode following ESF reset. However, to be consistent with the station design, the Unit 2 circuit has been modified such that the valves will remain open following reset of SI regardless of the main feedwater pump breaker position. The Unit 1 circuit will be modified during the next refueling outage.

Periodic tests for both units have been modified to demonstrate all equipment remains in its emergency mode upon resetting of the actuation signals.

The following tests were modified:

1-PT-57.4 Safety Injection Functional Test (Unit 1)

2-PT-57.4 Safety Injection Functional Test (Unit 2)

1-PT-66.3 Containment Depressurization Actuation Functional Test (Unit 1)

2-PT-66.3 Containment Depressurization Actuation Functional Test (Unit 2)

These tests are required at least once every 18 months pursuant to the applicable Technical Specifications. Each test will be performed during the next unit refueling outage. The refueling outages for Units 1 and 2 are scheduled for December, 1980 and September, 1981 respectively.

The following special test will be developed to test main steam line isolation.

1-ST-25 Main Steam Line Isolation Reset Test (Unit 1)

2-ST-23 Main Steam Line Isolation Reset Test (Unit 2)

These tests will also be performed during the refueling shutdown of the applicable unit.