

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 24, 1981 27 84.0

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. 163
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 February 27, 1981, in reference to the inspection conducted at North Anna Power Station on December 9-12, 1980 and reported in IE Inspection Report Nos. 50-338/80-42 and 50-339/80-39. 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. Pursuant to Section 182 of the Atomic Energy Act of 1954, this material is being submitted under oath.

Very truly yours,

B.R. Sylvia
B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

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

8104220219

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM DECEMBER 9-12, 1980

NRC COMMENT

Technical Specification Section 4.7.15.b requires that penetration fire barriers shall be verified to be functional by a visual inspection prior to declaring a penetration fire barrier functional following repairs or maintenance.

Contrary to the above, the fire damper modification between the Units 1 and 2 cable tunnels was not inspected after the modification to assure that this penetration fire barrier was functional.

This is a Severity Level V Violation (Supplemental I.E.).

RESPONSE

1. Admission or Denial of the Alleged Violation

The Notice of Violation is correct as stated.

2. Reasons For The Violation

This infraction was the result of an administrative error. Vepco Design Change No. 78-68I inadvertently omitted the requirement to inspect the damper after it was installed. Field Quality Control waived visual inspection of the damper since it was classified as QA Category III. Stone & Webster Advisory Operations performed a visual inspection of the damper after it was installed, but no documentation was made at the time for later verification.

3. Corrective Steps Taken and Results Achieved

On March 16, 1981 this damper was visually inspected by the Fire Marshal's designee, and found in need of repair. A fire watch was immediately posted in the area, and an Emergency Maintenance Request and a Deviation Report were submitted. Maintenance was performed on the damper, and it was visually inspected and verified operational.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

Henceforth, all Design Change modifications to fire protection related systems will be 100% inspected by Q.A. prior to being placed in service.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM DECEMBER 9-12, 1980

NRC COMMENT

License Condition paragraph 2.c (11) requires that no later than November 1, 1980, Vepco shall implement the fire protection modifications as described in the Commission Safety Evaluation Report, "Fire Protection Program for North Anna Power Station Units 1 and 2" (FPSER), dated February 1979, except implementation of the safe shutdown system shall be implemented no later than April 1, 1981.

Contrary to the above, the sprinkler system for the high ceiling portion of the cable tunnel utilized closed heads in lieu of open heads as required by Table I of FPSER, and in addition, portable fire extinguishers were not provided at Auxiliary Service Water Pump House as required by Table 1 of FPSER.

This is a Severity Level V Violation (Supplement I.E.).

RESPONSE

1. Admission or Denial of the Alleged Violation

The Notice of Violation is correct as stated.

2. Reasons for the Violation

This infraction was the result of an administrative error. The only difference between closed heads and open heads on the sprinkler system is that the closed head uses a fusible link which opens at a specified temperature. The Fire Marshall had not removed the fusible links because he thought that the fire insurance company representative had to witness a hydrostatic test of the sprinkler system. On December 11, 1980, when informed of the violation, the Fire Marshall contacted the insurance company and determined that it was not necessary to have a representative witness the hydrostatic test of the system. The fusible links were then removed to provide open heads on the sprinkler system to comply with the FPSER.

The Fire Marshall misunderstood the requirement that a fire extinguisher be placed in the Auxiliary Service Water Pump House. He thought it was to be placed in the Fire Pump House.

3. Corrective Steps Taken and Results Achieved

On December 11, 1980, when informed of the infractions, the fusible links were removed from the sprinkler system which changed the closed heads to open heads as required by Table 1 of FPSER. On the same date, portable fire extinguishers were provided in the Auxiliary Service Water Pump House.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

No additional corrective steps are required.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.