VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 10, 1990

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No. 90-575
NAPS/JHL R1
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/90-18 AND 50-339/90-18
RESPONSE TO THE NOTICE OF VIOLATION

We have reviewed your letter of September 11, 1990 which referred to the inspection conducted at North Anna on July 18, 1990 through August 18, 1990 and reported in Inspection Report Nos. 50-338/90-18 and 50-339/90-18. Our response to the Notice of Violation is attached.

If you have any further questions, please contact us.

Very truly yours,

W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

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RESPONSE TO THE NOTICE OF VIOLATION REPORTED DURING THE NRC INSPECTION CONDUCTED BETWEEN JULY 18, 1990 AND AUGUST 18, 1990 INSPECTION REPORT NOS 50-338/90-18 AND 50-339/90-18

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on July 18, - August 18, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990), the violation is listed below:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities referenced in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Equipment control and maintenance procedures are referenced in Regulatory Guide 1.33.

Contrary to the above, equipment control and maintenance procedures failed to adequately control the removal of the high head safety injection pump cubicle blocks, which act as both a radiological shield and a fire barrier, in that on August 8, 1990, the blocks for the 1B pump cubicle were removed without authorization and while the pump was considered operable.

This is a Severity Level V violation (Supplement I).

RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by inadequate administrative controls on removal and replacement of removable blocks.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Human Performance Enhancement System evaluations were performed as a result of the high head safety injection pump concrete block removal event and a similar event that occurred on May 23, 1990, pertaining to the removal of missile shield blocks at the Service Water Pump House (refer to LER N1/2 90-007).

Management provided station supervision with written instructions defining the station's policy for controlling removable blocks.

Maintenance personnel have been counselled on the importance of notifying the Shift Supervisor prior to removing any removable block.

The Operations Department implemented a requirement that a Technical Specification Information Only Action Statement be entered when a missile shield block is removed.

Construction personnel have developed a method for tracking the removal and restoration of missile shield blocks.

An Engineering Change Request has been requested to add instructions to Engineering Standard STD-GN-0001, Instructions For DCP Preparation, to more fully evaluate and control the removal of missile shield blocks during the course of construction activities. As an interim measure, appropriate engineering personnel have been instructed to include an evaluation of block removal in the development of plant modifications.

An action plan was developed to administratively control removable blocks.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The action plan to administratively control removable blocks includes the following actions to prevent recurrence:

Missile shield blocks will be labeled with identifying information regarding their function and instructions to contact the control room prior to removal.

Other removable blocks will be labeled with identifying information regarding their function and instructions to contact the control room prior to removal.

Service water pump and service water screenwash pump maintenance operating procedures will be revised to control removal and restoration of missile shield blocks.

Engineering Standard STD-GN-0001 will be revised to include an evaluation of block removal during plant modifications.

Maintenance procedures will be revised and/or developed. They will include sign-off steps for removal and installation of removable blocks and ensure proper lifting equipment and a qualified operator are available for replacement of blocks in the event of severe weather.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Missile shield blocks will be labeled by October 31, 1990.

Other removable blocks will be labeled by June 30, 1991.

Service water pump and service water screenwash pump maintenance operating procedures will be revised by December 15, 1990.

Engineering Standard STD-GN-0001 will be revised by December 15, 1990.

Maintenance procedures will be revised and/or developed as part of the ongoing Procedures Upgrade Program.