

FEB 11 1994

Docket Nos. 50-338, 50-339
License Nos. NPF-4, NPF-7

Virginia Electric and Power Company
ATTN: Mr. W. L. Stewart
Senior Vice President - Nuclear
5000 Dominion Boulevard
Glen Allen, VA 23060

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-338/93-14 AND 50-339/93-14

Thank you for your response of July 2, 1993, to our Notice of Violation issued on June 3, 1993, concerning activities conducted at your North Anna facility. In our response to you dated July 26, 1993, we stated that we were evaluating your response to Violation C. We have completed our evaluation and have concluded, for the reasons stated in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. Therefore, in accordance with 10 CFR 2.201 (a), please submit to this office within 30 days of the date of this letter, a written statement describing steps which have been taken to correct Violation C and the results achieved, corrective steps which have been taken to avoid further violations, and a date when full compliance will be achieved.

The responses directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

We appreciate your cooperation in this matter.

Sincerely,

Original signed by

Ellis W. Merschoff, Director
Division of Reactor Projects

Enclosure:
Evaluations and Conclusion

cc w/encl: (See page 2)

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PDR ADOCK 05000338
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JFC

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cc w/encl:

M. L. Bowling, Jr., Manager
Nuclear Licensing
5000 Dominion Boulevard
Glen Allen, VA 23060

G. E. Kane, Station Manager
North Anna Power Station
P. O. Box 402
Mineral, VA 23117

Executive Vice President
Old Dominion Electric Cooperative
4201 Dominion Boulevard
Glen Allen, VA 23060

Dr. W. T. Lough
Virginia Corporation Commission
P. O. Box 1197
Richmond, VA 23209

William C. Porter, Jr.
County Administrator
Louisa County
P. O. Box 160
Louisa, VA 23093

Michael W. Maupin, Esq.
Hunton and Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, VA 23219

Attorney General
Supreme Court Building
101 North 8th Street
Richmond, VA 23219

Robert B. Strobe, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P. O. Box 2448
Richmond, VA 23218

bcc w/encl:

G. Belisle, RII
L. Garner, RII
J. Lieberman, OE
L. Engle, NRR
Document Control Desk

Virginia Electric & Power Company 3


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bcc w/encl cont'd:
NRC Resident Inspector
U.S. Nuclear Regulatory Commission
Route 2, Box 78-A
Mineral, VA 23117

U.S. Nuclear Regulatory Commission
Resident Inspector Office
Surry Nuclear Power Station
5850 Hog Island Road
Surry, VA 23883

*SEE PREVIOUS CONCURRENCE PAGE FOR SIGNATURES.

RII:DRP RII:DRP RII:EICS

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bcc w/encl:
G. Belisle, RII
L. Garner, RII
L. Engle, NRR
Document Control Desk

NRC Resident Inspector
U.S. Nuclear Regulatory Commission
Route 2, Box 78-A
Mineral, VA 23117

NRC Resident Inspector
U.S. Nuclear Regulatory Commission
Route 1, Box 166
Surry, VA 23883

*RII:DRP <i>GB</i>	*RII:DRP <i>MS</i>	*RII:DRP <i>BUryc</i>
GBelisle	MSinkule	BUryc
02/1/94	02/1/94	02/09/94

ENCLOSURE

EVALUATIONS AND CONCLUSIONS

On June 3, 1993, a Notice of Violation (Notice) was issued for three violations (A, B and C) identified during a routine NRC inspection. Virginia Electric and Power Company (VEPCO) responded to the violations on July 2, 1993. The licensee denied Violation C based on their interpretation of Technical Specification (TS) 4.6.4.2.a. The NRC's evaluations and conclusions regarding the licensee's arguments are as follows:

Restatement of Violation C

Technical Specification 4.6.4.2.a requires that each hydrogen recombiner system shall be demonstrated operable at least once per 6 months by verifying during a recombiner system functional test that the minimum heater sheath temperature increases to $\geq 700^{\circ}\text{F}$ within 90 minutes and is maintained for at least 2 hours and that each purge blower operates for 15 minutes.

Contrary to the above, since March 16, 1992, the licensee failed to verify that each purge blower, 1(2)-HC-F-1, is operated for 15 minutes at least once per 6 months.

Summary of Licensee's Response

The licensee's position is that the purge blowers specified by TS Surveillance Requirement 4.6.4.2.a are the hydrogen recombiner purge blowers. The purge blowers located in the Auxiliary Building, 1/2-HC-F-1, are not part of the hydrogen recombiner system and therefore, they are not required to be tested by the TS since they cannot provide a suction source for the hydrogen recombiners.

The licensee states that the Updated Final Safety Analysis Report (UFSAR) describes the Containment Atmospheric Cleanup (CAC) System that would be used to maintain containment hydrogen concentrations at safe levels following a design basis accident. The CAC system contains two identical skid mounted hydrogen recombiners, two hydrogen analyzers, two purge blowers and associated piping. Each recombiner consists of a blower, an electric preheater, a reaction chamber and cooler, instrumentation, and piping, all of which are mounted on a skid. The piping associated with the hydrogen recombiners is seismically qualified.

The licensee states that the UFSAR also provides a description of the containment purge blowers as permanently installed, 50 standard cubic feet per minute, positive displacement, containment purge blower in parallel with the containment vacuum pumps for each unit. The containment purge blower can draw air from the containment after a LOCA and discharge it to the gaseous waste disposal system. It can be operated in parallel with the hydrogen recombiner system purge blowers when the containment is to be purged, ensuring that a failure of both hydrogen recombiner systems will not leave the containment without purge capability.

The licensee states that the piping for the containment purge blowers in the Auxiliary Building is not totally seismically qualified. Therefore, these

containment purge blowers can not be used to take suction from the containment and discharge to the process vents when operating in Modes 1 through 4. Therefore, TS Surveillance Requirement 4.6.4.2.a clearly does not apply to this system.

The licensee states the requirements for NUREG-0737, Item II.E.4.1. They also state that their response described their redundant hydrogen recombiner system. The response also described the backup hydrogen purge system.

The licensee states that NUREG-0737, Item II.E.4.1, was reviewed by the NRC in March 1982 and April 1983 and successfully closed.

The licensee concludes their argument by stating that based on the UFSAR, TS, NRC acceptance of NUREG-0737, Item II.E.4.12, their position is that the hydrogen recombiner blower is the referenced component in TS Surveillance Requirement 4.6.4.2.a.

NRC Evaluation

It is clear from the licensee's response and as discussed in NRC Inspection Report Nos. 50-338/93-10 and 50-339/93-10, and 50-338/93-14 and 50-339/93-14, and the UFSAR that the hydrogen recombiner system purge blowers and the containment purge blowers are two separate and distinct system components. Until March 1992 the licensee's surveillance tested the containment purge blowers using periodic test procedure PT-213.17, Valve Inservice Inspection (HC Check Valve) and Purge Blower 1-HC-F-1 (a similar procedure exists for 2-HC-F-1). At that time a Procedure Action Request was issued and the requirement for testing was deleted. The licensee concluded that the deletion was justified based on their interpretation and position as previously stated. However, when this requirement for testing was deleted, a subsequent modification to the TS should have been submitted. The existing requirement for testing the containment purge blowers was clearly stated in the TS and this was not being performed until this issue was identified by the NRC Resident staff.

NRC Conclusion

The licensee has not presented any information that was not previously known and carefully considered prior to enforcement action being taken. The TS requirement to test the containment purge blowers is clearly stated. The NRC staff has concluded that the violation occurred as stated.