

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 7, 1990

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No.: 90-539  
NAPS/JHL R0  
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**  
**NRC INSPECTION REPORT NOS. 50-338/90-15 AND 50-339/90-15**  
**RESPONSE TO THE NOTICE OF VIOLATION**

We have reviewed your letter dated August 10, 1990, which refers to the inspection conducted at North Anna from May 16, 1990 through July 14, 1990 and reported in Inspection Report Nos. 50-338/90-15 and 50-339/90-15. 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  
Region II  
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 MAY 26, 1990 AND JULY 14, 1990**  
**INSPECTION REPORT NOS. 50-338/90-15 AND 50-339/90-15**

**NRC COMMENT**

During the Nuclear Regulatory Commission (NRC) inspection conducted May 26 - July 14, 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. Calibration and Maintenance procedures are referenced in Regulatory Guide 1.33.

Contrary to the above, procedures were not followed or were inadequate as evidenced by the following:

1. ICP-P-MI-3 (sic), Miscellaneous Safety Related Instruments, specifies in Section 1.0 that its purpose is to provide instructions to calibrate any instrument provided the instrument is not Environmentally Qualified (EQ). On June 26, 1990, the procedure was not followed in that it was used to calibrate the Unit 2 hydrogen analyzer, which is EQ. It was subsequently identified that the procedure has also been used to calibrate the Unit 1 hydrogen analyzer the previous week.
2. ICP-P-1-MI-3 was inadequate in that acceptance criteria for calibrating the temperature control switch and the low temperature alarm failed to specify tolerance bands or specified incorrect tolerance bands for required setpoints.
3. Maintenance Department Administrative Procedure 0002, Conduct of Maintenance, Section 6.3.4 requires that maintenance activities affecting safety-related equipment shall be performed using only controlled vendor manuals. On June 26, 1990, the procedure was not followed in that calibration activities were performed on the safety-related Unit 2 hydrogen analyzer, using uncontrolled reference material for determining instrument setpoints.

This is a Severity Level IV Violation (Supplement 1).



## **RESPONSE TO THE NOTICE OF VIOLATION**

### **1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION**

The violation is correct as stated.

### **2. REASON FOR THE VIOLATION**

The violation was caused by the failure of personnel, both supervisory and craft, to follow procedures.

Personnel also failed to follow procedures by using an uncontrolled vendor technical manual to perform maintenance on the Unit 2 hydrogen analyzer. A copy of Surry's controlled vendor manual, "Operation Manual For K-111 Containment Hydrogen Monitor", the same model as used at North Anna, was obtained. However, the administrative processing to incorporate the manual into the North Anna Controlled Vendor Manual Program was not completed prior to use in the field.

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

Evaluations were performed by both I & C and Engineering and it was determined that the calibrations on the hydrogen analyzers were acceptable.

A copy of the hydrogen analyzer vendor technical manual has been incorporated into the controlled vendor manual program.

Instrument Calibration Procedure ICP-P-1-MI-3 was revised to include in the initial conditions that it be verified that the instrument being calibrated is not environmentally qualified and that it is not covered by another calibration procedure. ICP-P-1-MI-3 will not be used for calibrating the hydrogen analyzers.

Personnel involved were counselled on the importance of compliance with procedures. Instrument Department Supervisors have been made more sensitive to the need for procedure compliance.

The more appropriate EQ procedures (ICP-HC-1-H2A-101 and ICP-HC-2-H2A-201 "Containment Hydrogen System Reactor Containment Hydrogen Analyzer") were revised to include tolerance bands for the temperature control switch setpoints.

Periodic QA Performance Based Assessments of maintenance (including Instrumentation) activities have not identified any additional examples of using incorrect procedures on EQ or safety related equipment.

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

No specific additional actions required. However, three ongoing programs: Procedure Upgrade, Vendor Manual Upgrade and Internal Self Assessment will further strengthen the maintenance process.

5. **THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance has been achieved.