

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

NOV 2 10 04

October 28, 1982

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 579
NO/RMT:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of October 4, 1982 in reference to the inspection conducted at North Anna Power Station between August 6 and September 5, 1982 and reported in IE Inspection Report Nos. 50-338/82-29 and 50-339/82-29. Our response to the specific infraction is 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. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

W. L. Stewart
W. L. Stewart

Attachment

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

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PDR ADOCK 05000338
G PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/82-29 AND 50-339/82-29

NRC COMMENT:

Technical Specification 4.7.8.1.e requires as a surveillance on the safeguards area ventilation system (SAVA), that after every 720 hours of charcoal absorber operation a laboratory analysis of a representative carbon sample be obtained.

Contrary to the above, as of August 27, 1982, a representative carbon sample had not been taken after 720 hours of operation on the charcoal absorbers. Both trains of the system had been in operation for over 2800 hours since the last test.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The Notice of Violation is correct as stated.

(2) REASONS FOR VIOLATION:

The surveillance on the SAVS absorbers was missed due to a lack of administrative control. Laboratory analysis of the SAVS filter carbon is required by T. S. 3.7.8.1 every 720 hours of filter operation and at least once every 18 months. The 18 month surveillance of the charcoal filter was being performed when it was discovered that the filters had accumulated 2922 hours and 2848 hours for I-HV-FL-3A and 3B respectively since the last test. Timers on each filter record the integrated number of operating hours. An inadequate administrative mechanism existed for initiating the surveillance every 720 hours of filter operation.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

A periodic test has been written and implemented to insure the charcoal filters are tested as often as necessary to comply with Technical Specification requirements. This test will calculate the number of hours available for the use of each filter until a lab analysis is necessary.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

No further actions are required.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.