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VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION
P. O. BOX 402
MINERAL, VIRGINIA 23117

10 CFR 50.73

April 29, 1992

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

Serial No. N-92-16 NAPS:WCH Docket Nos. 50-338 50-339 License Nos. NPF-4

NPF-7

Dear Sirs:

The Virginia Electric and Power Company hereby submits the following Licensee Event Report applicable to North Anna Units 1 and 2.

Report No. 50-338,339/92-009-00

This Report has been reviewed by the Station Nuclear Safety and Operating Committee and will be forwarded to the Corporate Management Safety Review Committee for its review.

Very Truly Yours,

Station Manager

Enclosure:

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

NRC FORM 366 U.S. NUCLEAR REGULATORY COMM (6-60) LICENSEE EVENT REPORT (LER) FACILITY NAME (1)											COMME		APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS IN COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARD: ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, A PAPERWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAG BUDGET, WASHINGTON, DC 20503.														
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On April 2, 1992, with Unit 1 in Mode 1 and Unit 2 in Mode 5, an evaluation of surveillance requirements was being performed as a corrective action for misse 3 surveillances reported under LER 50-338,339/92-007-00. During this review, it was determined that a portion of the circuitry in the Containment Purge and Exhaust (CP/E) isolation system had not been adequately tested in accordance with Technical Specification (TS) Table 4.3-3, TS 4.6.3.1.2.c, TS 4.9.4 and TS 4.9.9. This event is reportable pursuant to 10CFR50.73 (a) (2) (i) (B).

The cau 3 of the event is personnel errors resulting in failure to develop appropriate procedures to satisfy TS surveillance requirements.

This event posed no significant safety implications because subsequent testing of the CP/E channels demonstrated that all circuitry was capable of performing its intended function. Therefore, the half and safety of the general public was not affected at any time due to this event.

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U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P.530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 2055S, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 2050S.

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TEXT (It more space is required, use additional NRC Form 366A's) (17)

1.0 Description of the Event

On April 2, 1992, with Unit 1 in Mode 1 and Unit 2 in Mode 5, an evaluation of surveillance requirements was being performed as a corrective action for missed surveillances reported under LER 50-338,339/92-007-00. During this review, it was determined that a portion of the the circuitry in the Containment Purge and Exhaust (CP/E) isolation system had not been adequately tested. Technical Specification (TS) Table 4.3-3 "Radiation Monitoring Instrumentation Surveillance Requirements" specifies that CP/E radiation monitor RM) channel functional tests be performed monthly and channel calibratic . be performed at a refueling frequency. TS 4.6.3.1.2.0 requires verificat: every 18 months that on a CP/E isolation signal, each CP/E valve actuate: o its isolation position. During refueling operations, TS 4.9.4 requires that each required containment penetration be verified isolated or tested in accordance with applicable portions of TS 4.6.3.1.2 and TS 4.9.9. TS 4.9.9 specifies that the CP/E isolation system be demonstrated operable within 100 hours prior to the start of and at least once per 7 days during core alterations by verifying that CP/E isolation occurs on manual initiation and on a high radiation test signal from the containment gaseous and particulate RM instrumentation channels. The detailed review identified a portion of the CP/E isolation circuitry which was not being tested by its surveillance procedures. Since the entire circuit was not teltal as required by a channel calibration and channel functional, this event is reportable pursuant to 10CFR50.73 (a)(2)(i)(B) as a missed TS surveillance.

The channel functional and channel calibration procedures for the RMs ensure that the RMs actuate their appropriate relays on a HI-HI signal. The CP/E actuation is tested by actuating the containment particulate RM. CP/E is then left isolated and contacts are checked on the containment gaseous and containment area RMs. The only portion of the circuit that was not tested was the permanent interconnecting wires that are connected to the RM relay contacts. Since the RM contacts that are checked do not verify continuity of the entire circuit, the CP/E isolation surveillances have been missed.

2.0 Significant Safety Consequences and Implications

The RM channels ensure that radiation levels are continuously measured and automatic actuations are initiated if radiation trip level setpoints are exceeded. The CP/E isolation system ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The operability of this system restricts the release of radioactive material from the containment atmosphere to the environment. This event posed no significant safety implications because subsequent testing of the CP/E channels demonstrated that all circuitry was capable of performing its intended function. Therefore, the health and safety of the general public was not affected at any time due to this event.

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U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

3.0 Cause of the Event

The case of the event is personnel error resulting in failure to develop appropriate procedures to satisfy the surveillance requirements.

4.0 Immediate Corrective Actions

The Operations Shift Supervisor was immediately notified that a portion of the CP/E circuitry had not been tested, and the appropriate Action Statement of TS 3.6.3.1 was entered for Unit 1. Therefore, each affected penetration was verified isolated by use of at least one deactivated automatic valve secured in the isolation position. Unit 2 was in mode 5 when the missed surveillances were discovered, and these LCOs were not applicable.

5.0 Additional Corrective Actions

CP/E isolation tests (PT-91.1) were revised to test the entire circuitry and the tests were successfully performed on both units.

6.0 Actions to Prevent Recurrence

In accordance with the Action Plan of LER 50-338,339/92-007-00 an additional review of other complex instrumentation/electrical surveillance requirements will be performed to verify TS surveillance requirements are fully met.

7. Similar Events

LER 50-338,339/90-009-03 described an event where full response time testing of the Source Range Neutron Flux Reactor Trip preamplifiers, the Power Range Neutron Detector isolation amplifiers and the Overtemperatu. Delta Temperature Reactor Trip lag and lead/lag cards was not performed due to incorrect TS interpretation.

LER 50-339/91-001-00 documents an event where a set of contacts and associated wiring on the control room bench board switch for the Train A power operated relief valve (PORV) over pressure control circuitry had not been tested as required by TS surveillance requirement 4.4.3.2.1.b. The cause of the event was the incorrect interpretation of TS 4.4.3.2.1.b. Previous interpretations did not require testing of the contacts and associated wiring for the PCRV control circuitry.

NRC FORM 366A (8-89)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED OMB NO. 9150-0104 EXPIRES: 4/30/92
	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION	ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20556, AND TO THE PAPERWORK REDUCTION PROJECT (0150-0104). OFFICE OF MANAGEMENT AND THE PAPERWORK REDUCTION PROJECT (0150-0104).

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

7.0 Similar Events (continued)

LER 50-338,339/92-007-00 documents missed surveillances of RCP bus undervoltage/underfrequency circuitry and SI input to reactor trip.

8.0 Additional Information

None.