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VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

August 6, 1984

Mr. James P. O'Reilly  
Regional Administrator  
Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30323

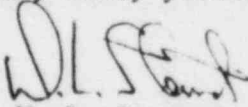
Serial No. 369A  
NO/JHL:acm  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Mr. O'Reilly:

Enclosed is our supplemental response to IE Inspection Report Nos. 50-338/84-09 and 50-339/84-09. This supplemental response was required to revise the completion dates stated in our previous letter of July 13, 1984.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report 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

Attachment

cc: Mr. Richard C. Lewis, Director  
Division of Project and Resident Programs

Mr. James R. Miller, Chief  
Operating Reactors Branch No. 3  
Division of Licensing

Mr. M. W. Branch  
NRC Resident Inspector  
North Anna Power Station

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SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-338/84-09 AND 50-339/84-09

NRC COMMENT:

Technical Specification 6.8.1.c requires, in part, that written procedures be established covering surveillance and test activities of safety-related equipment. ANSI N18.7-1976, to which the licensee is committed, requires that procedures incorporate or reference requirements and acceptance limits.

Contrary to the above, 1 and 2-PT-36.7.5 "Engineered Safeguard Features Pump Response Times" and numerous other time response testing periodic tests do not contain adequate acceptance criteria in that the acceptance criteria of these procedures do not specify acceptance limits.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated. The Response Time Surveillance Requirement of Technical Specifications 3.3.1.1 and 3.3.2.1 accomplished by 1 and 2-PT-36.7.5 did not contain specific acceptance limits. The acceptance limits of the entire response time loop were given in a separate surveillance document 1 and 2-PT-36.8.

(2) REASONS FOR VIOLATION:

This violation occurred because the original procedure development utilized a partial loop testing technique. Separate surveillance documents were used for these partial response time measurements, and a compiling document was utilized to obtain all partial response times and then verify that the total loop response time met Technical Specification requirements. The requirement of ANSI N18.7-1976 for acceptance criteria in each discreet surveillance document was not believed to be applicable for partial loop testing. Each procedure did contain an acceptance criteria section in the format, but the acceptance criteria were limited just to obtaining test data.

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

An evaluation of the program was conducted on partial loop testing. The results of this evaluation indicated the need for the corrective actions delineated in Section 4 below.

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

The discrepancies and problems with response time tests, as identified in Notice of Violation 84-09-02, are in the process of being resolved. The following actions are either being implemented or planned to correct the problems.

1. All response time tests, except the RTD response time procedure, are scheduled to be performed during the 1984 refueling outages for Unit 1 and 2. Because of plant conditions required by our test method, the RTD response time procedure will be completed when the unit is stable at 100% power. This action will insure that the most recent data is available to calculate the total train response time.
2. As a conservative measure the total train response time procedure (PT-36.8) will be completed prior to startup utilizing response time data provided by the RTD manufacturer. This action will identify any unacceptable equipment response times prior to startup. The actual RTD test data will be utilized to calculate the total train response time when it becomes available.
3. Following the refueling outage all equipment response time procedures will be reviewed and revised to insure adequate acceptance criteria exists. The acceptance criteria will be based on past data, and developed such that the sum of individual equipment response times is less than the maximum acceptable total train response time. Also, if the equipment response time exceeds the acceptable limits, the total train response time procedure shall be performed to reflect the new time and to insure compliance with the Technical Specification limit.
4. The development of a master callout procedure, or other mechanism to insure all response time tests are scheduled during a refueling outage and as close to startup as possible, will be evaluated and implemented as necessary.
5. The compiling document (PT-36.8) and partial loop procedures are being revised to ensure that the entire loop (i.e. all partial loop tests) is completed within the same 18 month inspection timeframe and that adequate corrective actions are initiated if a partial loop test does not meet its acceptance criteria.

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

The above actions will resolve the problems associated with the response time tests, and will be completed prior to the next performance of the total train response time procedure. It is currently scheduled to complete the total train response time procedure and testing on Unit 2 by the end of the 1984 refueling outage and the response time procedure on Unit 1 by July 31, 1985.