

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

January 2, 1985

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

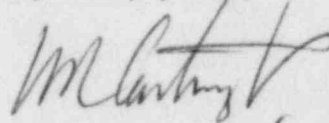
Serial No. 724
NO/sbe:bpl
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of December 3, 1984, in reference to the inspection conducted at North Anna Power Station between October 6 and November 5, 1984 and reported in IE Inspection Report Nos. 50-338/84-38 and 50-339/84-38. Our response to the notice of violation is attached.

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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RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM OCTOBER 6 TO NOVEMBER 5, 1984
INSPECTION REPORT NOS. 50-338/84-38 AND 50-339/84-38

NRC COMMENT:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained to control safety-related activity.

Performance test 2-PT-66.3 (Containment Depressurization Actuation Functional Test) specified procedure to test ESF actuation system.

Annunciator Response Procedure 2-AR-10 specified necessary actions to respond to Annunciator E-7 (Recirculation Spray Pump Casing Cooling Tank Level Hi/Low).

Contrary to the above, 2-PT-66.3 was defective and allowed inadvertent opening of MOV-RS-200A, which resulted in draining of the Casing Cooling Tank. Additionally, failure to follow annunciator response procedure 2-AR-10 resulted in 82,000 gallons of water being inadvertently drained to the Reactor Containment building basement.

This is a Severity Level IV violation (Supplement I)

RESPONSE:

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

REASON FOR THE VIOLATION:

This violation was the result of the periodic test procedure not clearly defining the actions that result from the initiation of test signals and the improper orientation and training of the testing personnel. In addition, the Operations personnel had not cleared the "locked in" casing cooling high/low alarm. Therefore, no additional indication of low level was available to the control room operator.

This situation was further complicated by 1) the greater than normal number of annunciator alarms that were lighted at the time of the test due to the units being shutdown and, 2) the location of the Unit 1 and 2 casing cooling indicators which are behind the Control Room backboards.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

When the draining of the casing cooling tank into the containment was recognized, an investigation was conducted to determine the source of the water. Subsequently, the cause was identified and the drainage terminated. The water was removed from the containment basement and the system line-up restored to normal. An inspection of the containment was also conducted.

These events were determined to be reportable as a Licensee Event Report which was submitted on November 19, 1984. (LER 84-009-00).

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

An action plan to reduce the number of lighted annunciators has been implemented to provide a systematic method for selectively identifying and resolving the causes of these conditions. In addition, an Operations Department instruction was issued to caution Operations personnel to respond to lighted annunciators in accordance with the Annunciator Response Procedure, and reemphasizing the importance of ensuring that the cause of the annunciator alarms are understood.

The governing periodic test, 2-PT-66.3, will be revised to clearly differentiate between the equipment that responds to the actuation of the auxiliary relays and that equipment that actuates from the slave relays (k600 series) and, if possible, to preclude multiple equipment actuations from a single jumper. In addition, the initial conditions section of those test procedures that perform an integrated functional test of ESF systems on a refueling frequency will be revised to include two separate reviews of the procedure for technical accuracy. This revision will also require that these reviews be completed at least one week prior to the scheduled start date for the test and that the most recent reference materials have been incorporated or specified. Finally, the concern over location of casing cooling indicators will be addressed during our NUREG-0700 review.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The instruction to Operations personnel has been issued. This instruction and a description of the event will be forwarded to the Training Department for inclusion into the training topics for the next cycle rotation.

The required revisions to the testing procedures will be completed prior to May 31, 1985.