VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

December 26, 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: 721
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 November 27, 1984, in reference to the inspection conducted at North Anna Power Station between October 9 and October 12, 1984 and reported in IE Inspection Report Nos. 50-338/84-40 and 50-339/84-40. 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

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM OCTOBER 9 TO OCTOBER 12, 1984
INSPECTION REPORT 50-338/84-40 AND 50-339/84-40

NRC COMMENT

Technical Specification 4.11.1.1.1 requires that whenever the secondary coolant activity is greater than 1 x 10E-5 uCi/ml, the turbine building sump shall be placed in manual operation and samples shall be taken and analyzed prior to release.

Contrary to the above, on January 1, 1984, January 13, 1984, February 2, 1984, February 16, 1984, and February 25, 1984, with secondary coolant activity greater than 1 x 10E-5 uCi/ml, the licensee made unmonitored releases from the turbine building sump to the plant storm drains.

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

RESPONSE:

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

REASON FOR THE VIOLATION:

During periods of high secondary coolant activity (greater than 1 x 10E-5 uCi/ml), T.S. 4.11.1.1.1 requires manual control of the drainage paths and sampling prior to the use of these pathways. In these instances, the turbine building sump pump control was placed in manual and a special order tag posted to caution the Operator to withdraw the sample and have it analyzed by the Health Physics Department prior to release. Due to a failure to follow the posted restrictions and have the analysis performed, the contents of the turbine building sump were discharged without prior monitoring for activity level.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

When notified of the unmonitored discharge, the Health Physics Department obtained samples of the sump and of the remaining fluid in the contaminated release pathway. An estimate of the total radioactivity was obtained and was found to be a very small percentage of the total Technical Specifications limit. Subsequently, this amount was added to the six month effluent release report. The operations personnel involved in the draining operations that led to the release were reinstructed on the importance of following established precautions during periods of high secondary coolant activity.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

An action plan has been developed to prevent any further unmonitored releases as follows:

A. TRAINING

1. The operator training program will be revised to include the following information:

   a) identification of systems that contain radioactivity when primary to secondary leakage occurs,

   b) precautions to be taken when venting and draining operations take place on these systems,

   c) techniques to be used to prevent spills and leakages when required,

   d) special precautions to be taken when operating secondary systems such as pumps, tanks, etc.,

   e) increasing level of concern for preventing any radioactivity from entering unmonitored pathways,

2. Importance of preventing unmonitored releases will be included in the Radiation Worker Training Program.

B. PROCEDURES

1. An abnormal procedure to handle an unmonitored release will be developed that will include:

   a) methods for stopping the release
   b) methods to sample and identify the release
   c) methods to quantify and to minimize the effects of the release
   d) specify the special reporting requirements that apply

2. Issue an Operations Department Instruction to elaborate on the additional precautions that must be taken until the procedure changes and the training are completed

3. The monitoring of the Steam Generator Blowdown flow (less than 30 gpm) has been added to the Auxiliary Building Operators logsheet. Also, the vent stack is to be monitored for overflow every 4 hours. The corrective actions and notifications are also provided.

C. SYSTEMS

1. Initiate an evaluation to provide monitoring capability and automatic isolation of the turbine building sump discharge

2. Evaluate improvements in the operation of the blowdown tank vent condensers

3. Initiate a study to vent the RWST to their respective safeguards building

4. Provide for the priority identification and repair of leaks from systems that contain radioactivity

D. Station Management is actively involved in implementing of these corrective actions and is committed to eliminating unplanned and unmonitored releases.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

A. TRAINING

The changes to the training program are to begin immediately and are expected to be completed during the second training cycle rotation for operations personnel in 1985.

B. PROCEDURES

The procedure changes will be completed by January 15, 1985. The additional instructions have been issued to all Operations Personnel.

C. SYSTEMS

The evaluations and requests for additional studies by the Engineering and Construction Department have been made. The cost, scope and schedule study is expected to be completed by 2-28-85 for the automatic isolation of the turbine building sump and by 4-15-85 for the RWST vent. Any further actions required to implement the recommendations made as a result of these studies will be scheduled and implemented as required.

The establishment of priority for repairs will be completed by January 15, 1985.