

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

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December 21, 1984

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

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

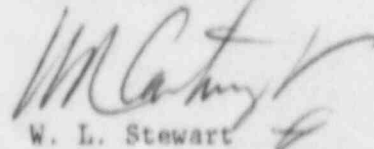
Serial No. 227A  
NO/JHL:acm  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Mr. O'Reilly:

In our response dated May 11, 1984 to the Notice of Deviation reported in IE Inspection Report Nos. 50-338/84-04 and 50-339/84-04, we identified the corrective actions taken and the results achieved in response to this deviation on the control and storage of compressed gas bottles. Since then, these corrective actions have been reexamined and were found to be inadequate. Therefore, the following is an updated response to this Notice of Deviation.

We have determined that no proprietary information is contained in this updated response. Accordingly, the Virginia Electric and Power Company has no objection to this response 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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UPDATED RESPONSE TO "NOTICE OF DEVIATION"  
INSPECTION REPORT NOS. 50-338/84-04 AND 50-339/84-04

NRC COMMENT:

Section 3.5.5, (Missiles from Compressed Gas) of the North Anna Power Station Units 1 and 2 Updated Final Safety Analysis Report, states, "In the event of a localized failure, such as a valve stem, the compressed gas bottles will not become rocket-propelled missiles, since they are secured in racks. The location of the gas storage facilities in relationship to equipment essential for initiating and maintaining a shutdown precludes the possibility of interaction in the event of an incident".

Contrary to the above, numerous pressurized high pressure gas bottles, not secured in racks, have been left unattended/stored in areas which contained equipment essential for initiating and maintaining a safe shutdown. Additionally, there is not a formal program to control nonflammable high pressure gas bottles and the prevalent practice is to loosely secure the bottles with rope.

This deviation applies to both units.

RESPONSE:

The gas bottles in question were temporarily supplied to support design change work and other on-going routine maintenance activities. The section 3.5.5 of the NAPS Units 1 and 2 UFSAR refers to the established gas storage areas which support normal plant operations and identifies the design for these permanent gas storage facilities. This deviation is correct, in that, the temporary gas bottles were not subjected to the same level of control as that specified in the UFSAR.

DESCRIPTION OF IMMEDIATE CORRECTIVE ACTIONS:

As soon as station personnel were notified of this deviation, a walkdown was conducted in the areas identified and the unneeded bottles were removed. The temporary supply of bottles needed to continue the work were properly secured. The craft personnel were reinstructed verbally by Station Management that the supply of bottles on hand should be only those needed and must be properly secured at all times.

ACTIONS TAKEN TO AVOID FURTHER DEVIATIONS:

The following corrective actions have been taken or scheduled for completion to prevent any further deviations:

1. Compressed gas bottles that are not in a specifically designed storage facility within the protected area have been removed. The storage racks currently in place contain a supply of hydrogen and other calibration gases required to support

station operation. These racks are those described in the North Anna UFSAR, section 3.5.5, "Missiles from Compressed Gas", and are designed to preclude the generation of missiles because of the securing method. For those bottles required to support routine operations, in addition to the above mentioned storage, permanent racks will be constructed as soon as possible.

2. A procedure, "Control of Compressed Gas Cylinders", will be implemented to prevent improper use of compressed gas bottles inside of the protected area. This procedure will invoke a three part tagging system that will ensure the responsibility for the proper handling of the bottle assigned. This should prevent unauthorized storage of the bottles within the protected area. This procedure is scheduled for implementation by January 1, 1985.
3. A Station Manager's directive was issued to all station supervisors outlining the augmented gas cylinder program.

DATE WHEN THESE CORRECTIVE ACTIONS WILL BE COMPLETED:

The completion dates for these items not yet completed are discussed in the previous paragraph.