

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

10 CFR 50.73

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# October 15, 1992

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

NAPS:MPW	
Docket Nos.	50-338
Docket Nos.	50-339
License Nos.	NPF-4
License Nos.	NPF-7

Dear Sirs:

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

## Report No. 50-338,339/92-012-00

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,

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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

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APPROVED OME NO. 5150-0104 EXPIRES: 400/92 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION

COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN

#### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

DONTINUATION
ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P.630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DO 20565, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DO 20503.
DOCKET NUMBER (2)
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PAGE (3)

North Anna Power Station Units 1 & 2

TEXT (If more agains is required, use additional MRC Form 0464 at (17)

AGBC FORM 366A

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# 1.0 Description of the Event

Periodic Test Procedure 2-PT-57.4, Safety Injection (SI) (EIIS System Identifier BQ) Functional Test, was revised on February 19, 1992 to add steps to test the SI transfer to the cold leg recirculation mode on a simulated refueling water storage tank (EIIS System Identifier BE, Component Identifier TK) Lo-Lo level. It was during this revision process that 2-IA-TV-201A and 2-IA-TV-201B were inadvertently deleted. The two trip valves are located on a containment penetration (EIIS Component Identifier PEN) that is not used and has a blind flange (EIIS Component Identifier PSF) installed on each end.

On October 7, 1992, further TS surveillance review determined that four leakage monitoring connection valves (IMC) 1-HV-1000, 1-HV-1001, 2-HV-2000, and 2-HV-2001, (EIIS System Identifier VA, Component Identifier VTV) on the purge/exhaust piping were not being verified closed and capped every 31 days as required by TS 4.6.1.1.a. The LMC valves were verified closed and capped. These events are reportable pursuant to 10CFR50.73 (a) (2)(i)(B).

## 2.0 Significant Safety Consequences and Implications

No significant safety consequences resulted from these events because containment integrity was verified by confirming that the containment isolation instrument air supply trip valves and the purge exhaust penetration LMC valves were in their required closed position. Therefore, the health and safety of the public were not affected at any time during this event.

## 3.0 Cause of the Event

The cause of the instrument air supply trip valve missed surveillance was personrel error due to failure to follow procedure. During the last procedure revision, on February 19, 1992, the two trip valves were inadvertently removed. The procedure governing releadure process control requires a technical review and validation of any procedure being revised. The validation methods used on 2-PT 57.4 Revision 17 included Table Top and Simulator reviews. During the simulator validation the valves in question were noted as a discrepancy since the control room simulator is modeled identical to Unit 1 and the trip valves are unique to Unit 2. Personnel were aware that the penetration existed on Unit 2 but was abandoned (blind flanged on both sides). The valves were in-distributly deleted from the procedure without a proper validation of valve status.

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During previous surveillance requirement reviews the LMC valves were not identified as requiring the 31 day verification. As a sesult, the containment integrity procedure was not revised to include the LMC valves and the monthly verification surveillance was not performed.

### 4.0 Immediate Corrective Actions

Containment instrument air supply trip valves, 2-1A-TV-201A and 201B, were declared inoperable. The 24 hour action of TS 4.0.3 was entered. At 1350 hours the action statement was cleared and the valves were returned to operable status following satisfactory SI functional testing.

The leakage monitoring control valves were verified closed and capped.

## 5.0 Additional Corrective Actions

Changes to Periodic Test Procedure 2-PT-57.4, Safety Injection (SI) Functional Test will be made, prior to the next refueling outage, to reinstate verification that 2-TA-TV-201A and 201B actuate to their isolation position on a Phase "A" isolation test signal.

Changes to Periodic Test Procedures 1 & 2-60.1, Containment Integrity, have been made to include the LMC valves to ensure verification in the future.

#### 6.0 Actions to Prevent Recurrence

Personnel awareness is being heightened on procedure process controls relating to procedure use, revisions, and compliance by way of station wide employee information meetings.

#### 7.0 Similar Events

Previous reportable events concerning missed surveillance's on TS valves due to surveillance program errors have occurred on Unit 1 - LERs N1-80-041, N1-83-022, N1-85-002, N1-88-099, and Unit 1/2 N1/2-90-003.

### 8.0 Additional Information

North Anna Unit 1 was in Mode 1 at 84.6% power on September 25, 1992 and in a refueling coastdown.