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April 22, 1985



VIRGINIA POWER

Dr. J. Nelson Grace
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

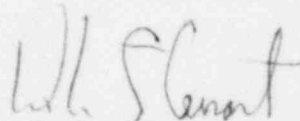
Serial No. 85-223
NO/sbe
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

We have reviewed your letter of March 22, 1985, in reference to the inspection conducted at North Anna Power Station conducted from February 6 to March 3, 1985 and reported in IE Inspection Report 50-338/85-03 and 50-339/85-03. Our response to the Notice of Violation is addressed in the attachment.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power 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. Roger D. Walker, Director
Division of Reactor Projects

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 FEBRUARY 6 TO MARCH 3, 1985
REPORT 50-338/85-03 AND 50-339/85-03

NRC COMMENT

Technical Specification (TS) 6.8.1 requires that written procedures be established, implemented and maintained covering the areas recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes the areas of Equipment Control (tagging and locking) and Emergency Core Cooling Systems.

- a. North Anna Power Station Administrative Procedure (ADM) 14.0, "Tagging of Systems and/or Components" (03-31-83), paragraph 5.1.4 references the VEPCO Accident Prevention Manual to require the removal of danger tags when work on a system or component is complete. The procedure was not followed in that, on February 28, 1985, temporary mechanical systems were packed for storage with the danger tags still attached.
- b. 1&2-OP-7.7A "RWST" and 1&2-OP-7.7, "Operation of RWST System" are procedures that provide guidance for aligning and operating the Refueling Water Storage Tank System (RWST). These procedures require that both the inlet and outlet isolation valves of the secured RWST refrigeration unit be closed, and were not followed in that, on February 22, 1985, the secured refrigeration unit for the RWST on each unit was found with only the outlet isolation valve shut.

Contrary to the above TS, the referenced procedures were not fully implemented.

This is a Severity Level IV violation and applies to both Units.

RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

This violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation example part a., was the result of personnel error. The maintenance personnel that removed the valve for replacement did not not notify the Operations Department that the tag required removal and reinstallation on the new replacement valve. When the tagging report was cleared, a verification was made that the danger tag was removed and the valve was in its desired position. The personnel performing the position verification did not attempt to locate the tag. The violation example part b., was due to a procedural problem. The operating procedure (1&2-OP-7.7) that is

used to remove the system from operation does not require the closure of the inlet or outlet valves when the refrigeration units are alternated. However the valve line-up procedure (1&2-OP-7.7A) does require that the valves be closed on the secured refrigeration unit.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Station personnel were reinstructed on the need to ensure that station tags are released prior to removing the components for rework or replacement by the Operations Department. This was accomplished by a Station Managers Directive on March 7, 1985.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The Operating Procedures (1&2-OP-7.7) will be revised to require the closure of the inlet and outlet valves when the refrigeration unit is secured.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The procedure revisions will be completed by May 30, 1985.