

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 23, 1997

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

Serial No.	97-300
NAPS/MPW/ETS	R3
Docket Nos.	50-338
	50-339
License Nos.	NPF-4
	NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/97-02 AND 50-339/97-02
REPLY TO THE NOTICE OF VIOLATION

We have reviewed your letter of May 5, 1997, which referred to the inspection conducted at North Anna Power Station from February 23, 1997 through April 5, 1997, and the associated Notice of Violation which was reported in Inspection Report Nos. 50-338/97-02 and 50-339/97-02. Our reply to the Notice of Violation is attached.

Each chart recorder in question has an indicator and/or redundant instruments which provide parameter indication for operational control. The charts are used for historical record and furthermore, are not required by Technical Specifications. Based on the limited regulatory and safety significance of the issue, it is requested that the Notice of Violation be reconsidered for categorization as a Non-Cited Violation. We believe that this issue meets the requirements in the NRC Enforcement Manual for categorization as a Non-Cited Violation.

No new commitments are intended as a result of this letter. If you have any further questions, please contact us.

Very truly yours,

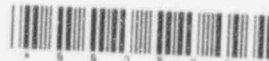
James P. O'Hanlon

James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

300064

9706020249 970523
PDR ADOCK 05000338
G PDR



JEDI/1

cc: U. S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Mr. M. Morgan
NRC Senior Resident Inspector
North Anna Power Station

REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/97-02 AND 50-339/97-02

NRC COMMENT

During an NRC inspection conducted on February 23, 1997 through April 6, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Item 1.a references procedures for operator log-keeping.

Procedures 1 and 2-GOP-1.0, Unit 1 and 2 CRO Turnover Checklist, Revision 12 and 11, respectively state, "Verify proper operation of the control board recorders by verifying that the recorder is rotating, inking properly, and that the chart paper is the proper scale. IF NOT, THEN take corrective action."

0-OPAP-0004, Logs and Operating Records, Revision 5, Paragraph 6.7, states in part, that "Recorder charts shall be checked to ensure they are operational."

Contrary to the above, on March 28, 1997, operators had not correctly verified that the Units 1 and 2 Reactor Coolant Pumps' Number 1 Seal Leakoffs and the Unit 2 NR 46 Nuclear Power Range chart recorders were operational. For several days, operators had initialed the chart recorders without identifying that the recorders were not inking properly.

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

REPLY TO NOTICE OF VIOLATION

1. REASON FOR THE VIOLATION

The reason for the violation was a failure to place adequate emphasis on proper chart recorder inking. The chart recorders are primarily used for a historical record and are not used nor required for operational control. The control room operators were relying on redundant indication for these parameters. It should be noted that although the pens were not inking, each recorder has an indicator that was functioning properly.

There are two chart recorders, per unit, associated with the reactor coolant pumps number 1 seal leakoff (i.e. narrow and wide range). The narrow range recorders, were not inking properly since the pens were off scale. This is an expected condition for the narrow range indicators when the plant is at normal operating pressure. With the pens off scale, their siphon capability was lost as a result of riding over the chart paper drive holes. Primary indication is obtained from the wide range indicators during normal operating conditions. The wide range indicators were operating/inking properly during this time.

Each chart recorder for overpower range indication has 2 different color pens inking on the same chart paper. When the unit is at 100 percent power, as was the case, the pens ink virtually on top of each other. At first glance the chart recorder would appear to be functioning properly with one pen not inking. Again, the control room operators rely on the calibrated instruments on the bench board and vertical boards to provide parameter indication for operational control. As such, the safety significance associated with the chart recorders not inking properly is extremely low.

2. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Upon identification of the deficiency, a station deviation report was initiated.

The reactor coolant pump number 1 seal leakoff chart recorders identified in the Notice of Violation have been adjusted to limit the upscale travel of the pens. The narrow range recorder pen was re-primed and proper operation resumed.

General Operating Procedure 0-GOP-7, Daily Check of Control Room Chart Recorders was implemented to perform a daily verification that all control room control room chart recorders in service are working properly.

Operators were coached on the operability of control room chart recorders and procedure compliance.