

November 3, 1994



VIRGINIA POWER

Mr. R. W. Crisp
Regional Director
Federal Energy Regulatory Commission
3125 Presidential Parkway, Suite 300
Atlanta, Georgia 30340

Serial No. F94-013

Dear Mr. Crisp:

PROJECT NO. 6335-VA
NORTH ANNA HYDROELECTRIC PROJECT
EMERGENCY ACTION PLAN ANNUAL REVIEW AND TEST EXERCISE

Pursuant to 18 CFR, Section 12.25(b) of the Commission's regulations, an Emergency Action Plan (EAP) test exercise was conducted at the North Anna Hydroelectric Project (FERC Project No. 6335) on October 12, 1994. A copy of the test exercise summary and critique are enclosed as Attachment 1 to this letter. The primary objective of the exercise, which was to test the Company's capability to implement the EAP, was successfully achieved.

In accordance with provisions established in Appendix D of the North Anna Hydroelectric EAP, an annual review of the plan has been performed. Results of this review indicate that the EAP Notification Flowchart, Communications Directory and Letters of Acknowledgment require updating. Accordingly, a revision to the EAP that incorporates these modifications is being prepared. The revised EAP, when approved, will be submitted to FERC under separate cover. No other revisions or updates are necessary at this time.

Should you have any questions concerning this submittal, please contact Mr. J. E. Collins at (804) 273-2728.

Very truly yours,

R. F. Saunders

Attachment

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

Docket Nos. 50-338 and 50-339
License Nos. NPF-4 and NPF-7

U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. R. D. McWhorter
NRC Senior Resident Inspector
North Anna Power Station

PROJECT NO. 6335-VA
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA HYDROELECTRIC PROJECT
OCTOBER 12, 1994 EMERGENCY ACTION PLAN
TEST EXERCISE SUMMARY AND CRITIQUE RESULTS

A. TEST EXERCISE SUMMARY:

<u>APPROX. TIME</u>	<u>EVENT</u>
0930 -	Test exercise initiated at North Anna Dam.
-	Spillway Attendant evaluated dam conditions in accordance with 0-GOP-3.1 (Main Dam Daily Inspection).
0945 -	Spillway Attendant identified abnormal condition at the dam.
0948 -	Spillway Attendant notified North Anna Power Station (NAPS) Simulated Control Room of an abnormal condition at the dam.
-	NAPS Simulated Control Room Shift Supervisor verified phone system available for communications with Spillway Attendant.
0950 -	NAPS Simulated Control Room Shift Supervisor initiated 0-AP-40.2 (Dam Failure Assessment and Notification).
-	NAPS Simulated Control Room Shift Supervisor confirmed/declared a Class II Emergency.
-	NAPS Simulated Control Room Shift Supervisor simulated sending two operators to the dam to investigate the situation, and also simulated contacting Nuclear Site Services to request dispatch of a civil engineer to the dam.
0955 -	NAPS Simulated Control Room Shift Supervisor notified Superintendent Operations of event.
0957 -	NAPS Simulated Control Room Shift Supervisor notified Corporate Security of event and directed call-out of Virginia Power Advisory Team.
1001 -	Corporate Security called NAPS Simulated Control Room Shift Supervisor for event verification.
-	Corporate Security initiated call-out of Virginia Power Advisory Team.

A. TEST EXERCISE SUMMARY (continued):

<u>APPROX. TIME</u>	<u>EVENT</u>
1002 -	NAPS Simulated Control Room Shift Supervisor began notifying off-site jurisdictions: Virginia DES, Louisa, Spotsylvania, Caroline, Hanover, and King William.
1009 -	NAPS Simulated Control Room Shift Supervisor completed notifying off-site jurisdictions.
-	Virginia power Advisory Team began assembling in Corporate Emergency Response Center.
1010 -	Corporate Security completed call-out of Virginia Power Advisory Team.
1014 -	Virginia Power Advisory Team fully assembled in Corporate Emergency Response Center.
1016 -	Virginia Power Advisory Team contacted NAPS Simulated Control Room Shift Supervisor for a status report.
-	Virginia Power Advisory Team notified the National Weather Service.
1020 -	Virginia Power Advisory Team notified the Federal Energy Regulatory Commission (FERC).
1024 -	Virginia Power Advisory Team simulated dispatching Civil Engineering representatives to the dam.
1025 -	Spillway Attendant notified the NAPS Simulated Control Room Shift Supervisor of an increase in seepage rate and increase in soil particles in the seepage through the dam.
1027 -	Simulated Control Room Shift Supervisor notified the Virginia Power Advisory Team of deteriorating conditions at the dam.
1030 -	Virginia Power Advisory Team attempted to notify the Virginia Department of Conservation and Recreation, Division of Soil and Water Conservation, Dam Safety Section (no answer, three contacts attempted).

A. TEST EXERCISE SUMMARY (continued):

<u>APPROX. TIME</u>	<u>EVENT</u>
1034 -	Virginia Power Advisory Team upgraded the classification to a Class I emergency.
-	Virginia Power Advisory Team called the NAPS Simulated Control Room Shift Supervisor to advise him about the classification change and verify status.
1035 -	NAPS Simulated Control Room Shift Supervisor requested the Spillway Attendant to inspect other areas for leakage.
1037 -	Virginia Power Advisory Team notified the Virginia DES to provide a briefing and request assistance in contacting Dam Safety representative.
1038 -	Virginia Power Advisory Team evaluated the activation of the NAPS Radiological Emergency Response Plan.
1039 -	NAPS Simulated Control Room Shift Supervisor instructed the Spillway attendant to evacuate the dam.
1040 -	Spillway Attendant notified the NAPS Simulated Control Room Shift Supervisor of an increase in leakage rate through the dam. It was a muddy boil.
1041 -	Simulated Control Room Shift Supervisor notified the Virginia Power Advisory Team of the deteriorating condition at the dam.
1100 -	Test exercise terminated.

B. TEST EXERCISE CRITIQUE RESULTS (continued):

Virginia Power personnel successfully demonstrated the capability to implement the Hydroelectric Emergency Action Plan for Lake Anna Dam.

During the course of the test exercise and associated critique, drill participants, controllers and observers proposed several items for consideration as program enhancements. These items related to modification of the notification process, procedural upgrades, and drill control.

Objectives demonstrated during the test exercise are provided below. Critique comments are also included, where applicable.

1. Ability to analyze dam conditions, assess dam emergency classification, and classify the dam emergency.
2. Ability to notify and mobilize the North Anna and corporate response organizations.
3. Ability to notify the state and local governments and the Federal Energy Regulatory Commission (FERC):

Issues:

- a. Notifications to local jurisdictions were not made when the emergency classification was escalated.
- b. The Virginia Department of Conservation and Recreation, Division of Soil and Water Conservation, Dam Safety Section representative could not be contacted. The Virginia Power Advisory Team took compensatory action by requesting assistance from Virginia DES.

Comments:

- a. Enhance Abnormal Procedure 0-AP-40.2 by:
 - 1) Including telephone number for Spillway Attendant in case the radio system is out of service.
 - 2) Providing "standard message format" for use when initially contacting State and local jurisdictions.
 - 3) Including back-up phone numbers for local jurisdictions in the event of Insta-phone failure.

B. TEST EXERCISE CRITIQUE RESULTS (continued):

4. Ability to establish and maintain effective communications:

Comments:

- a. The EAP Notification Flowchart needs updating.
 - b. A conference phone is needed in the CERC to facilitate status updates.
 - c. Consider use of facsimile machine to transmit drawing of the dam identifying/transmitting event conditions.
 - d. Identify location to which the Spillway Attendant should report in the event the Dam must be evacuated.
5. Ability to develop an action plan to mitigate/recover from a potential emergency at the Lake Anna Dam.
6. Ability to conduct a self-critique and to identify areas for improvement:

Comments:

- a. Use radios on the EP channel for future drills.
- b. Procedures worked well. However, the need to resolve the classification upgrade notification process and to incorporate selected procedure enhancements was identified.