Virginia Electric and Power Company North Anna Power Station P. O. Box 402 Mineral, Virginia 23117

September 22,1998

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

Serial No.: 98-550 NAPS: MPW Docket No.: 50-338 License No.: NPF-4

Dear Sirs:

Pursuant to 10CFR50.73, Virginia Electric and Power Company hereby submit the following Licensee Event Report applicable to North Anna Unit 1.

Report No. 50-338/98-004-00

This report has been reviewed by the Station Nuclear Safety and Operating Committee and will be forwarded to the Management Safety Review Committee for its review.

Very truly yours,

W. R. Matthews
Site Vice President

Commitments contained in this letter: None

Enclosure

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

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

9809290063 980922 PDR ADOCK 05000338 S PDR Terr

NRC FORM 366 (4-95)

#### U.S. NUCLEAR REGULATORY COMMISSION

#### APPROVED BY OMB NO. 3150-0104 EXPIRES 4/30/98

# LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)

## NORTH ANNA POWER STATION, UNIT 1

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 733), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

DOCKET NUMBER (2)

PAGE (3)

05000338

1 OF 3

| EVENT DATE (5)                                  |     |        | LER NUMBER (6)                          |                   |  | REPO  |               | OTHER FACILITIES INVOLVED (8) |                    |          |                   |                |                         |                             |                        |  |  |
|---|-----|--------|---|-------------------|--|---|---------------|-------------------------------|--------------------|----------|-------------------|----------------|-------------------------|-----------------------------|------------------------|--|--|
| монтн   | DAY | YEAR   | YEAR                                    | SEQUENTIAL NUMBER | REVISION<br>NUMBER   | монтн   | DAY           | YEAR                          | FACILITY NAME      |          |                   |                | DOCUMENT NUMBE<br>05000 |                             |                        |  |  |
| 09  | 02  | 98     | 98                                      | 004               | 00   | 09  | 22            | 98                            | FACILITY           | Y NAME   |                   |                |                         | DOCUMENT NUMBER             |                        |  |  |
| OPERA   |     |        | THIS R                                  | EPORT IS SU       | BMITTED  | PURSUA  | T OT T        | HE REC                        | UIREME             | ENTS O   | F 1               | 0 CFR §: (Chec | ck one or m             | ore) (11                    | 1)                     |  |  |
| MODE (9)  |     | 1      | 20.2201(b)                              |                   |  | 20.2203(a)(2)(v)  |               |                               | x 50.73(a)(2)(i)   |          |                   |                | 50.73(a)(2)(viii        |                             |                        |  |  |
| POWER   |     |        | 20                                      | .2203(a)(1)       |  | 20.2  | 2203(a)(      | 3)(i)                         | 50.73(a)(2)(ii)    |          |                   |                |                         | 50                          | 50.73(a)(2)(x)         |  |  |
| LEVEL (10)                                      |     | 100%   | 20                                      | .2203(a)(2)(i)    |  | 20.2  | 2203(a)(      | 3)(ii)                        | 50.73(a)(2)(iii)   |          |                   |                |                         | 73                          | 73.71                  |  |  |
|   |     |        | 20.2203(a)(2)(ii)                       |                   |  |   | 20.2203(a)(4) |                               |                    |          | 50.73(a)(2)(iv)   |                |                         | OTHER                       |                        |  |  |
|   |     |        | 20.2203(a)(2)(iii)                      |                   |  | 50.36(c)(1)   |               |                               |                    |          | 50.73(a)(2)(v)    |                |                         | Specify in Abstract below   |                        |  |  |
|   |     |        | 20                                      | .2203(a)(2)(iv    | 50.36(c)(2)  |   |               |                               | 50.73(a)(2)(vii)   |          | or in NRC Form 36 |                | Form 366A               |                             |                        |  |  |
| NAME  |     |        |   |                   | LIC  | ENSEE C   | ONTAC         | TFOR                          | THIS LEF           | R (12)   |                   |                |                         |                             |                        |  |  |
| NAME  |     | ,      | CACCOST, FOR SERVICE CHARLES & SERVICES | Matthews          | CHEST MADE IN THE TOTAL CONTROL OF THE TOTAL CONTRO | CONTRACTOR OF THE PARTY OF THE |               |                               |                    |          |                   | (540) 894      | -2101                   | rea Code)                   |                        |  |  |
|   |     |        | COME                                    | PLETE ONE L       | INE FOR E  | EACH COM  | PONE          | NT FAIL                       | URE DE             | SCRIBE   | DI                | N THIS REPOR   | T (13)                  | THE R P. LEWIS CO., LANSING |                        |  |  |
| CAUSE   |     | SYSTEM | COMPONENT MANUFACTURER                  |                   | CTURER   | TO NPRDS 4  |               |                               | AUSE SYSTEM        |          | M                 | COMPONENT      | MANUFACTURER            |                             | REPORTABLE<br>TO NPRDS |  |  |
| and the second service of                       | -   |        |   |                   |  | -   |               |                               |                    |          |                   |                |                         |                             |                        |  |  |
| SUPPLEMENTAL REPORT EXPECTED (14)               |     |        |   |                   |  | 4)  |               |                               |                    | EXPECTED |                   | MONTH          | DAY                     | YEAR                        |                        |  |  |
| YES (If yes, complete EXPECTED SUBMISSION DATE) |     |        |   |                   |  | X   | NO            |                               | SUBMISSION<br>DATE |          |                   |                |                         |                             |                        |  |  |

On September 2, 1998, with Unit 1 in Mode 1, it was determined that two boron injection tank (BIT) outlet isolation valves were not tested in accordance with Technical Specification (TS) 4.0.5. The TS requires inservice testing of ASME Code Class 1, 2, and 3 pumps and valves. During a change to the testing frequency for the BIT inlet isolation valves the outlet valves were removed from the procedure without another procedure in place to ensure required testing was accomplished. This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) for a condition prohibited by Technical Specifications.

The cause of the missed surveillance is due to personnel error during the procedure revision process. Since both BIT outlet isolation valves tested satisfactorily on September 2, 1998 and had tested satisfactorily on the previous PT, the valves would have performed their design function during the period of the missed surveillance. Therefore, the health and safety of the public were not affected.

NRC FORM 366A (4-95)

U.S. NUCLEAR REGULATORY COMMISSION

# TEXT CONTINUATION

| FACILITY NAME (1)                | DOCKET   | LER NUMBER (6) |                      |                    |   | PAGE (3) |  |
|----------------------------------|----------|----------------|----------------------|--------------------|---|----------|--|
| , ,                              |          | YEAR           | SEQUENTIAL<br>NUMBER | REVISION<br>NUMBER |   |          |  |
| North Anna Power Station, Unit 1 | 05000338 | 98             | 004                  | 00                 | 2 | OF 3     |  |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

#### DESCRIPTION OF THE EVENT

Technical Specification 4.0.5 requires inservice testing of ASME Code Class 1, 2, and 3 pumps and valves in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted. Five ASME Code Class 2 valves (two inlet, two outlet and one check valve for the boron injection tank) included in the Inservice Testing program had a test frequency of once every three months or following valve maintenance. Relief from the testing frequency was initiated since testing the inlet valves during power operations was causing a significant hydraulic transient in the boron injection tank (BIT) (EIIS Component-TK, System-BQ) and the reactor coolant pump seal injection system (EIIS Component-P, System-AB). As such, an Inservice Inspection Program (ISI) Change was developed to change testing of the two BIT inlet isolation valves (EIIS Component-ISV) and the BIT inlet recirculation header check valve (EIIS Component-ISV) from quarterly to once every cold shutdown, but not more frequently than every three months. The relief request was subsequently approved to perform full stroke testing during cold shutdown.

With the approval of the relief request, a change to the implementing test procedure was necessary. The existing periodic test procedure (PT) was deleted and a new PT was developed to coincide with the numbering system used for cold shutdown PTs. During the procedure change process the two BIT outlet isolation valves were removed from the cold shutdown PT since they were not included in the approved ISI Program Change. At this point it was noted that a new PT was needed to test the outlet isolation valves however, it was not pursued. The cold shutdown PT was subsequently approved.

On July 28, 1998, the period to complete the TS surveillance test on the two BIT outlet isolation valves expired. During a review of the Unit 1 Refueling Outage test procedures it was noted that the two BIT outlet isolation valves were not covered by a PT. On September 2, 1998, at 1419 hours the station entered the 24 hour action of TS 4.0.3 and a deviation report was submitted to identify the missed surveillance. A new PT was developed and the valves were tested satisfactorily that day. The 24 hour action was cleared at 2013 hours on September 2, 1998.

#### 2. SAFETY CONSEQUENCES AND IMPLICATIONS

Since both BIT outlet isolation valves tested satisfactorily on September 2, 1998 and had tested satisfactorily on the previous PT, the valves would have performed their design function during the period of the missed surveillance. Therefore, the health and safety of the public were not affected by this event. This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) for a condition prohibited by Technical Specifications.

NRC FORM 366A (4-95)

U.S. NUCLEAR REGULATORY COMMISSION

## LICENSEE EVENT REPORT (LER)

**TEXT CONTINUATION** 

| THE PERSON NAMED OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TO THE PERS | CHINOMION |      |                      |                    |     |      |
|--|-----------|------|----------------------|--------------------|-----|------|
| FACILITY NAME (1)  | DOCKET    |      | PAGE (3)             |                    |     |      |
|  |           | YEAR | SEQUENTIAL<br>NUMBER | REVISION<br>NUMBER |     |      |
| North Anna Power Station, Unit 1   | 05000338  | 98   | 004                  | 00                 | 3 0 | OF 3 |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

#### 3.0 CAUSE

Cause of the missed surveillance was due to inadequate revision of the periodic test procedure. Cause of the inadequate PT was due to personnel error during the procedure change process. Failure to ensure a procedure existed to test the two BIT outlet isolation valves when they were being deleted from the cold shutdown PT resulted in the missed surveillance.

## 4.0 IMMEDIATE CORRECTIVE ACTION(S)

The station entered the 24 hour action of TS 4.0.3 and a station deviation report was initiated to document the condition. A PT was developed and the BIT outlet isolation valves were tested satisfactorily.

#### 5.0 ADDITIONAL CORRECTIVE ACTIONS

Once the BIT outlet isolation valves were satisfactorily tested no other actions were necessary. Unit 2 requirements were reviewed and were noted to be different than Unit 1. Unit 2 TS do not require testing the BIT outlet isolation valves at power.

# 6.0 ACTIONS TO PREVENT RECURRENCE

Based on a review of previously submitted LER's this event appears to be an isolated incident and no further actions are required.

# 7.0 SIMILAR EVENTS

A review of LER's written since 1984 did not identify any cases where TS requirements for IST Program tests were deleted from the controlling PT procedures resulting in a missed surveillance.

# 8.0 ADDITIONAL INFORMATION

Unit 2 was operating at 100% and was not affected by this event.