

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 16, 1988

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

Serial No. 88-564  
NAPS/DEQ  
Docket No. 50-339  
License No. NPF-7

Gentlemen:

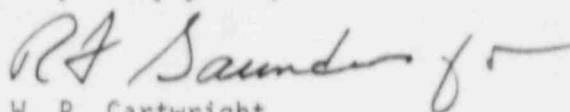
VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2  
NRC INSPECTION REPORT NOS. 50-338/88-16 AND 50-339/88-16  
REPLY TO NOTICE OF VIOLATION

We have reviewed your letter of August 17, 1988, which referred to the inspection conducted at North Anna between May 14 and June 10, 1988, and reported in Inspection Report Nos. 50-338/88-16 and 50-339/88-16. The response to the Notice of Violation is provided in the attachment. A detailed discussion of this event is provided in LER N2-88-004-00 dated June 17, 1988.

The North Anna Operating Experience Review (OER) program addresses both industry and station specific experience. To better utilize station experience in preventing recurrence, a root cause evaluation and trending process for station deviations is being developed (Reference Inspection Report 88-06). To better utilize industry experience, the Nuclear Operations Department Standard on OER will be strengthened to ensure timely screening and implementation of required actions. Corporate resources will be used to manage the screening process and to perform independent reviews after implementation. The station will retain overall responsibility for implementation. Also, status on OER performance will be tracked and reported to management. Finally, we plan to utilize INPO and EPRI resources in order to determine the need for further enhancements. Specific enhancements to the North Anna OER program are discussed in the attachment.

We have no objection to this correspondence being made a matter of public record. If you have any further questions, please contact us.

Very truly yours,



W. R. Cartwright  
Vice President - Nuclear

Attachment

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PDR ADOCK 05000338  
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cc: U. S. Nuclear Regulatory Commission  
101 Marietta Street, N. W.  
Suite 2900  
Atlanta, Georgia 30323

Mr. J. L. Caldwell  
NRC Senior Resident Inspector  
North Anna Power Station

ATTACHMENT

REPLY TO THE NOTICE OF VIOLATION REPORTED DURING THE NRC  
INSPECTION CONDUCTED BETWEEN MAY 14, 1988 AND JUNE 10, 1988  
INSPECTION REPORT NOS. 50-338/88-16 AND 50-339/88-16

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 14 - June 10, 1988, one violation of NRC requirements was identified. In accordance with with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

Technical Specification 3.8.1.1 requires in part, two separate and independent diesel generators be operable with the unit in Modes 1,2,3 and 4.

Technical Specification ACTION statement 3.8.1.1.e states in part, with two of the above required diesel generators inoperable, restore one of the inoperable diesel generators to an operational status within two hours, or be in at least Hot Standby within the next six hours and in Cold Shutdown within the following 30 hours.

Contrary to the above, with the reactor in Mode 1, both diesel generators were inoperable over a period of approximately 38 hours on May 18-19, 1988, while preventative maintenance was performed on one diesel generator, and the output breaker for the other diesel generator was inoperable because the charging spring motor was disengaged from the breaker housing.

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

## RESPONSE

### 1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

### 2. REASON FOR THE VIOLATION

The violation was the result of weaknesses in the operating experience document followup and closeout process for NRL IEIN 87-41 and INPO SER 14-87. As a result of these documents, some corrective actions were taken. However, based on the lack of a known history of broken or loose charging motor bolts at North Anna, the breaker preventative maintenance procedure was not revised to explicitly require a check for bolt tightness, and a daily check of breaker mechanical charge was not implemented.

### 3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

As stated in the letter from J. Nelson Grace to D. S. Cruden dated August 1, 1988, "ENFORCEMENT CONFERENCE SUMMARY", the following corrective actions to prevent recurrence have been completed.

- Replaced 2H EDG output breaker and performed operability test
- Checked all 4160 Volt breakers (safety and non-safety related) to verify closing springs were charged
- Implemented standing order requiring verification of mechanical charge following opening of a 4160 breaker
- Consulted with manufacturer on charging motor bolt torquing requirements
- Inspected safety related 4160 breakers (except emergency bus feeder breakers) for loose bolts. Also verified close latch spring installed (Safety and non-safety related breakers that have not yet been inspected will be inspected as plant operations permit)
- Revised breaker preventative maintenance to include both tightness check and increased preventative maintenance frequency

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED CONT'D

- Evaluated 480 Volt breakers for similar charging motor concerns
- Issued Nuclear Network message on North Anna experience
- Rescreened NRC IEIN 87-41.

To address weaknesses in the OER screening, followup and closeout process, the following actions have been taken.

- NRC Information Notices are assigned and tracked via the station Commitment Tracking System with the initial screening response and assignment of required actions due within 30 days. Appropriate members of the Station and Corporate Staffs, including the Systems Engineers, are involved in this initial screening. The initial screening is reviewed by the Supervisor of Nuclear Safety Engineering and any required actions are approved by the Assistant Station Manager.
- Station Administrative Procedure 16.14, "Commitment Tracking System", has been revised to clarify the process for generating and assigning any additional commitments required after the initial actions have been completed, and to strengthen the management review and control of commitment closeouts.
- Status reporting to management on OER performance has been strengthened.

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

No additional corrective actions are necessary.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.