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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

February 28, 1986

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

Serial No. 86-071
NAPS/JHL/acm
Docket No. 50-338
License No. NPF-6

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Dear Dr. Grace:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-338/85-36 AND 50-339/85-36

We have reviewed your letter of January 30, 1986, in reference to the inspection conducted at North Anna Power Station from December 2, 1985 to January 5, 1986, and reported in Inspection Report Nos. 50-338/85-36 and 50-339/85-36. Our response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact me.

Very truly yours,



W. L. Stewart

Attachment

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PDR ADDCK 05000338
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cc: Mr. Roger D. Walker, Director
Division of Reactor Projects
NRC Region II

Mr. Lester S. Rubenstein, Director
PWR Project Directorate # 2
Division of PWR Licensing - A

Mr. M. W. Branch
NRC Senior Resident Inspector
North Anna Power Station

Mr. Leon B. Engle
NRC North Anna Project Manager
PWR Project Directorate #2
Division of PWR Licensing-A

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM DECEMBER 2, 1985 TO JANUARY 5, 1986
INSPECTION REPORT NOS. 50-338/85-36 and 50-339/85-36

NRC COMMENT:

10 CFR 50, Appendix B, Criterion V, as implemented by the VEPCO QA Topical Report (VEP-1-4A), requires that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Design Change 83-32 procedure used through Field Change No. 36 was employed for the installation of environmentally qualified solenoid operated valves. The solenoid operated valve vendor installation instructions provided by the Automatic Switch Company (ASCO) for series 206-380 valves states that the valve must be mounted with the solenoid vertical and upright.

Contrary to the above, Design Change 83-32 procedure was not appropriate for use through Field Change No. 36, dated October 12, 1985, in that it contained conflicting requirements, resulting in improper installation of an ASCO solenoid operated valve, SOV-BD-100H. The solenoid was mounted at an approximate 45 degree angle to the vertical instead of in the required vertical position.

This is a Severity Level IV violation (Supplement I) and applies only to Unit 1.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEDGED VIOLATION:

The violation is correct as stated.

2. REASONS FOR THE VIOLATION:

Step 4.1.05.8 of DCP 83-32 states "Install new SOV in accordance with ASCO Instruction Manual and in the same orientation as the old SOV was installed". The ASCO Instruction Manual, under the heading Positioning, states "valves must be mounted with the solenoid vertical and upright".

These statements are conflicting. The existing SOV was mounted on an angle and the new SOV was mounted on the already existing support which was on an angle. The new SOV was installed in the same position as the old SOV but not "vertical and upright".

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

A review was performed on the SOV in question and it was, in fact, installed incorrectly in DCP 83-32. A review was then conducted on the other SOVs that were installed using DCP 83-32 and several other SOVs were also oriented incorrectly. To correct the discrepancy, Field Change No. 38 was written to make new supports and mount the affected SOVs in the vertical position. The proper installation of the affected SOVs was completed on December 19, 1985.

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

The Site Engineering Office (SEO) will review the active DCP's to ensure that steps requiring the installation of equipment/ devices are clear, concise, and in accordance with applicable manufacturers requirements.

The SEO will ensure that the installation of equipment can be performed as required when specifying installation in accordance with the manufacturer's instructions. The SEO will re-emphasize the importance of this to applicable personnel as described in E&C Standard STD-GN-0001, "Instructions for DCP Preparation."

Since Quality Control (QC) personnel did not identify the inconsistency in the DCP at a QC hold point, QC personnel will be directed to be more observant of instructions provided in manufacturer's instruction manuals. When there is conflict between the DCP and the manufacturer's instructions the discrepancy will be brought to the attention of engineering for resolution.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The items described in Section 4 of this response will be completed by April 1, 1986.