10CFR2.201

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 3, 1988

D. S. CRUDEN
VICE PRESIDENT-NUCLEAR

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

Serial No. 88-270
NAPS/DEQ
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
NRC INSPECTION REPORT NOS. 50-338/88-05 AND 50-339/88-05
REPLY TO A NOTICE OF VIOLATION

We have reviewed your letter of May 4, 1988 which referred to the inspection conducted at North Anna between February 24, 1988 and April 5, 1988 and reported in Inspection Report Nos. 50-338/88-05 and 50-339/88-05. The response to the Notice of Violation is provided 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,

D. S. Cruden

Attachment

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

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ATTACHMENT

RESPONSE TO THE NOTICE OF VIOLATION REPORTED DURING THE NRC INSPECTION CONDUCTED BETWEEN FEBRUARY 24, 1988 AND APRIL 5, 1988 INSPECTION REPORT NOS. 50-338/88-05 AND 50-339/88-05

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on February 24, 1988 - March 5, 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 3.6.3.1 requires the containment isolation valves specified in Table 3.6-1 shall be operable with the isolation times as shown in Table 3.6-1 in Modes 1,2,3, and 4.
>
> Technical Specification 4.6.3.1.1.b requires the isolation valves specified in Table 3.6-1 shall be demonstrated operable prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of the applicable cycling test and verification of isolation time.
>
> Contrary to the above:
>
> On September 15, 1986, Unit 1 entered Mode 4 with nine containment isolation valves, specified in Table 3.6-1, that were not stroke time tested following maintenance. The maintenance involved a modification to the vent paths of the solenoid valves associated with the containment isolation valves. This modification increased the stroke times of several of the valves. The valves were not stroke time tested until June of 1987.
>
> This is a severity Level IV violation (Supplement 1) and applied to both units.

RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The cause of the violation was due to an inadequate procedure. Engineering Work Request (EWR) 86-498A, B and C installed a street elbow or a bent section of copper tubing (if a street elbow was not available) on the vent port of the solenoid valves associated with various containment isolation trip valves. This EWR identified that a modification was being performed to safety related equipment but did not require post modification testing. Due to the inadequacy of the original EWR, nine containment isolation valves were not tested prior to entering Mode 4 following modification in September of 1986.

Post modification testing was not required because the EWR evaluation determined that the modification was not going to affect the internal mechanisms or the environmental qualification of the solenoid operated valve and did not consider other possible valve performance test requirements. Also, EWR modifications are required to be implemented in conjunction with approved station procedures. The EWR for the street elbow or copper tubing did not provide explicit instructions to install or test the modification in accordance with approved station procedures. Therefore, only the procedural steps included in the EWR were used to implement the modification.

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

Upon discovering the nine valves that were not tested prior to entry into Mode 4 following the installation of the street elbows or copper tubing, an investigation was performed to determine if the valves had been subsequently stroke time tested. Results of the investigation revealed that satisfactory stroke times were obtained during the subsequent 1987 outage (after the tubing installation). The modification caused the stroke times to increase, but the stroke times still met the Technical Specification limits. As a result, the valves were determined to be operable from the time the tubing was installed.

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

As stated in our April 21, 1988 response to the notice of violation from NRC Inspection Report 87-38, the procedural controls which govern post modification testing for both EWRs and design change packages (DCPs) will be strengthened.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The appropriate station administrative procedures and subordinate test procedures will be revised by June 30, 1988.