

ENCLOSURE

NOTICE OF VIOLATION

Virginia Electric and Power Company
North Anna

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on January 25 - 29 and February 8 - 12, 1988, violations of NRC requirements were identified. The violations involved failure to adequately implement the Inservice Testing (IST) Program and failure to conduct adequate audits of this program. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

- A. Units 1 and 2 Technical Specification (TS) Section 3.6.3, Containment Isolation Valves, states that the containment isolation valves specified in Table 3.6-1 shall be operable with isolation times as shown in Table 3.6-1. Additionally, Section 4.6.3.1.3 states that the isolation time of each power operated or automatic valve of Table 3.6-1 shall be determined to be within its limit when tested pursuant to specification 4.0.5.

Section 4.0.5. Surveillance Requirements For Inservice Inspection and Testing of American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 Components, shall be applicable as follows:

Inservice inspection of ASME code Class 1, 2 and 3 components and inservice testing of ASME code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

10 CFR 50.55a.(g).(4).(ii), states that inservice examinations of components and inservice tests to verify operational readiness of pumps and valves whose function is required for safety shall comply with the requirements of the code (ASME Section XI).

1. ASME Boiler and Pressure Vessel Code-1974, Section XI, Paragraph IMV3410 (c)(3), states that if an increase in stroke time of 25 percent or more from the previous test for valves with stroke times greater than ten seconds or 50 percent or more for valves with stroke times less than or equal to ten seconds is observed, test frequency shall be increased to once each month until corrective action is taken, at which time the original test frequency shall be resumed. In any case, any abnormality or erratic action shall be reported.

Contrary to the above, the stroke times for the following Units 1 and 2 TS valves increased by more than the Section XI limits of 25 percent or 50 percent and neither corrective action was taken nor was the test frequency increased to once each month as required:

2-TV-CC-200A	1-TV-CC-104A
2-TV-CC-200B	1-TV-CC-104B
2-TV-CC-200C	1-TV-CC-200A
2-TV-CC-201A	1-TV-BD-200A
2-TV-CC-202E	1-TV-BD-200E
1-TV-CC-100A	1-TV-BD-200F
1-TV-CC-100C	2-TV-BD-202A
1-TV-CC-102C	1-TV-BD-100B
1-TV-CC-102D	1-TV-BD-100C
1-TV-CC-102F	1-TV-BD-100D
1-TV-CC-103A	1-TV-BD-100A
1-TV-CC-103B	1-TV-BD-100E

This list is not intended to be all-inclusive.

2. ASME Boiler and Vessels Code-1974, Section XI, Paragraph IMV 3410(G), states that if a valve fails to exhibit the required change of valve stem or disk position by this testing, corrective action shall be initiated immediately. If the condition is not, or cannot be corrected within 24 hours, the valve shall be declared inoperative. When corrective action is required as a result of tests made during cold shutdown, the condition shall be corrected before startup. A retest showing acceptable operation shall be run following any required corrective action before the valve is returned to service.

Contrary to the above, when the following Unit 1 and 2 TS valves failed to exhibit the required position change, during routine surveillance testing inadequate or no corrective action was taken prior to performing a retest and returning the valves to an operable status:

2-TV-CC-201B	1-TV-CC-102C
2-TV-CC-202B	1-TV-CH-1204A
2-TV-CC-202C	2-TV-BD-200D
2-TV-CC-202D	2-TV-BD-200F
2-TV-CC-202E	2-TV-CV-250A
2-TV-CC-204A	2-TV-S1-201
2-TV-CC-204B	1-TV-MS-111A
2-TV-CC-205B	2-SW-MOV-222A

This list is not intended to be all-inclusive.

This is a Severity Level IV violation (Supplement 1).

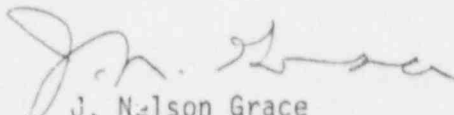
- B. 10 CFR 50, Appendix B, Criterion XVIII; and the licensee's accepted Quality Assurance Program, Virginia Electric and Power Company Topical Report, VEP-1-5A, Section 17.2.18, collectively require that a system of planned and periodic audits shall be carried out to verify compliance with all aspects of the Quality Assurance program. The licensee is committed to Regulatory Guide 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants." This Regulatory Guide endorses ANSI/ASME N45.2.12 - 1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." Paragraph 4.3.2.3 of this standard states that selected elements of the Quality Assurance Program shall be audited to the depth necessary to determine whether or not they are being implemented effectively.

Contrary to the above, the Inservice Testing program was not audited to the depth necessary to determine whether it was being implemented effectively, in that audits conducted from 1985-1987 did not identify that Unit 1 and 2 TS valves were not meeting ASME Section XI, Paragraph IMV 3410(c)(3) and IMV 3410(g) requirements.

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

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, North Anna, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION


J. Nelson Grace
Regional Administrator

Dated at Atlanta, Georgia
this 26th day of May 1988