

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

April 16, 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. 86-178
NAPS/JHL/vlh
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS NO. 1 AND 2
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-338/86-04 AND 50-339/86-04

We have reviewed your letter of March 18, 1986, in reference to the inspection conducted at North Anna Power Station from February 3, 1986 to March 2, 1986, and reported in Inspection Report Nos. 50-338/86-04 and 50-339/86-04. Our response to the Notice of Violation is addressed in the attachment.

The inspection report also requested that we confirm the corrective actions described in paragraph 12 relating to missing jumpers in the Westinghouse Reactor Protection Over-Power Delta Temperature Card (IEIN 85-98). The card repair procedure for lead-lag cards will be revised to require testing for both positive and negative derivative response by April 30, 1986. In addition, an Instrument Department Memorandum was issued on March 16, 1986 to require a specific jumper verification of replacement cards in addition to the component and loop calibration. This will ensure jumpers are installed when cards are replaced.

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

8605120359 860416
PDR ADOCK 05000338
Q PDR

IE01

VIRGINIA ELECTRIC AND POWER COMPANY TO

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

Mr. Virgil L. Brownlee, Chief
Reactor Projects Branch 3
Division of Reactor Projects
NRC Region II

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

Mr. Larry King
NRC 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 FEBRUARY 3, 1986 TO MARCH 2, 1986
INSPECTION REPORT NOS. 50-338/86-04 AND 50-339/86-04

NRC COMMENT:

Technical Specification 6.9.1 requires that written procedures be established, implemented and maintained covering the areas recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, which includes surveillance testing of the electrical system.

Section 4.3.2 of surveillance procedure 2-PT-83.4, dated July 25, 1985, requires that the operator maintain an electrical load between 2900- 3000 kw for the first 2 hours of the 24 hour emergency diesel generator run.

Contrary to the above, procedure 2-PT-83.4 was not fully implemented, in that, on February 23, 1986, the emergency diesel generator 2J was loaded to approximately 3200 kw for 7.5 minutes and then again to approximately 3450 kw for 1.5 minutes.

This is a Severity Level IV violation (Supplement I) and applies to Unit 2 only.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEDGED VIOLATION:

The violation is correct as stated.

2. REASONS FOR THE VIOLATION:

While performing 2-PT-83.4, there were various electrical fluctuations on the system grid which caused the momentary increase in load. The emergency diesel generator was not intentionally overloaded. The operator performing 2-PT-83.4 does not normally remain at the diesel generator control panel constantly because there are other duties to perform in the work area.

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

A Standing Order has been issued directing that a dedicated diesel generator operator be assigned to operate the diesel generator. This operator will have no other duties and will continuously monitor diesel generator load whenever the diesel generator is connected to the emergency bus in parallel with the off-site power source.

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

In order to have consistency between 2-PT-83.4, which specifically calls for the diesel generator to be loaded between 2900 and 3000 kw, and Technical Specification 4.8.1.1.2.d.7, which allows momentary variations in the loading (loadings potentially greater than 3000 kw), we will revise 2-PT-83.4 to be consistent with the Technical Specifications.

In addition, an evaluation will be conducted to determine the best long term solution for preventing the overloading of the diesel generator. When the evaluation is complete and the solution is implemented, the dedicated operator at the diesel generator control panel will no longer be required.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

2-PT-83.4 will be revised prior to the next performance of the surveillance test which is currently scheduled for September, 1987.