

January 4, 1988

Official Copy

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

Virginia Electric and Power Company
ATTN: Mr. W. L. Stewart, Vice President,
Nuclear Operations
P. O. Box 26666
Richmond, VA 23261

Gentlemen:

SUBJECT: NOTICE OF VIOLATION
(NRC INSPECTION REPORT NOS. 50-338/87-36 AND 50-339/87-36)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by J. L. Caldwell on October 20 - November 19, 1987. The inspection included a review of activities authorized for your North Anna facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed inspection report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The inspection findings indicate that certain activities appeared to violate NRC requirements. The violations and references to pertinent requirements are described in the enclosed inspection report. The elements to be included in your response to the enclosed Notice of Violation are described in the Notice.

We are concerned with the number and type of problems which have occurred during the Unit 2 outage and startup. These problems included unintentional injecting of the C accumulator, challenging the low temperature overpressure protection system while in a solid plant condition, exceeding the diesel generator load requirements, failure of reactor protection system instruments requiring the commencement of a plant shutdown, and plant startup with a power range nuclear instrument out of service. Similar problems were experienced during the Unit 1 outage and startup recently as documented in NRC Inspection Report 338,339/87-19. The apparent common thread in these instances is inadequate and/or failure to follow procedures. The last systematic assessment of licensee performance also identified personnel failure to follow procedure as a concern. It is evident that programs to trend and correct problems need improvement.

Violation A described in the enclosed Notice is similar to a violation contained in the Notice sent to you by our letter dated March 18, 1986. Because "similar violations," as described in the NRC Enforcement Policy, are of significant

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concern to the NRC, please give particular attention in your response to the identification of the root cause of this problem and your corrective action to prevent recurrence.

Your attention is invited to the unresolved items identified in the inspection report. These matters will be pursued during future inspections.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and its enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

J. Nelson Grace
Regional Administrator

Enclosures:

- 1. Notice of Violation
- 2. NRC Inspection Report

cc w/encls:

E. W. Harrell, Station Manager
 N. E. Hardwick, Manager - Nuclear
 Programs and Licensing

bcc w/encls:

NRC Resident Inspector
 DRS Technical Assistant
 Document Control Desk
 Commonwealth of Virginia

RII *RC*
 RCroteau:er
 12/18/87

RII *PC*
 PCantrell
 12/28/87

RII *BW*
 BWilson
 12/28/87

RII *GJ*
 GJenkins
 12/1/87
 1/4/88

RII *VR*
 VReyes
 12/28/87

RII *ME*
 MErnst
 12/28/87