

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company
North Anna Units 1 and 2

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on October 20 - November 19, 1987, violations of NRC requirements were identified. The violations involved inadequate procedures and failure to follow procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Technical Specification 6.8.1.c requires written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment.

Contrary to the above on October 26, 1987, the 2J Emergency Diesel Generator was electrically overloaded due to an inadequate surveillance procedure 2-PT-83.4, Blackout of Emergency Bus for Shutdown Loads. The procedure 2-PT-83.4 was inadequate in that the test equipment voltage criteria for establishing the diesel load was improperly calculated. This improper calculation resulted in the diesel being loaded to 3100 kw instead of the Technical Specification range of 2900 to 3000 kw. This violation is similar to violation 339/86-04-01 which cited the licensee for overloading the 2J diesel per 2-PT-83.4 in February of 1986, the last performance of the procedure.

This is a Severity Level IV violation (Supplement 1) and applies to Unit 2.

- B. Technical Specification 6.8.1.a. and c. requires written procedures be established, implemented and maintained covering procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 and surveillance and test activities of safety related equipment.

Regulatory Guide 1.33, Appendix A, Section 3, requires procedures for Startup, Operation, and Shutdown of safety-related systems including energizing, filling, venting, draining, shutdown, and changing modes of operation for systems including emergency core cooling, auxiliary feedwater, and nuclear instrumentation.

This violation has five examples:

- (1) Contrary to the above on October 14, 1987, the Unit 1 Refueling Water Storage Tank (RWST) level was allowed to drop below Technical Specification 3.5.5 limit. This RWST level reduction was due to an operator failing to follow procedure 1-OP-7.7, Operation of RWST Systems, by performing the restoration valve lineup out of sequence.

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- (2) Contrary to the above, on October 26, the Unit 2 Pressurizer Power Operated Relief Valve (PORV) was inadvertently lifted due to the operator failing to follow a surveillance procedure 2-PT-211.2. The operator cycled a safety injection valve aligning the discharge of the operating charging pump to the RCS which was solid. The operator failed to verify the initial conditions of the procedure which required all the charging pumps to be secured.
- (3) Contrary to the above, on October 31, an unexpected reactor protection system activation occurred on Unit 2 due to an inadequate procedure. The unit was in Mode 4 with the scram breakers closed. The reactor protection trip signal was generated by a surveillance procedure 2-PT-71.4 which was testing the time response of the auxiliary feedwater pumps. This procedure was inadequate in that it did not identify to the operators that a reactor trip signal would be generated with the start signal for the auxiliary feedwater pumps.
- (4) Contrary to the above, on October 30, Unit 2 was allowed to continue to operate in Mode 2 with an inoperable power range instrument, N44, without the instrument's protection signals being placed in trip as required by Technical Specification Table 3.3-1. This situation occurred due to inadequate procedures 2-PT-94.0 and ICP-2-N44, which placed the N44 instrument in the inoperable condition but did not require the protection signals to be placed in trip.
- (5) Contrary to the above, on October 30, the Reactor Coolant System (RCS) TAVE for Unit 2 was inadvertently decreased below the Technical Specification 3.1.1.5 of 541 degrees F. This inadvertent TAVE reduction was caused by the operator placing the power range instrument in a trip condition without an adequate procedure. The method used to place N44 in trip also generated an open signal to the feedwater regulating bypass valves which resulted in the inadvertent cooldown of the steam generators and consequently the RCS.

This is a Severity Level IV violation (Supplement 1) and applies to both units.

- C. Technical Specification 6.8.1.c requires written procedures be established, implemented and maintained covering surveillance and test activities of safety-related equipment.

Technical Specification 6.8.3.a allows temporary changes to procedures required by 6.8.1 as long as the intent of the original procedure is not altered.

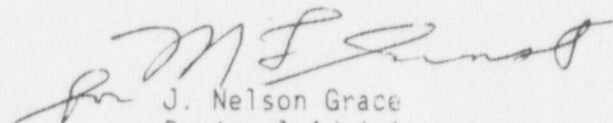
Technical Specification 6.8.2 requires changes to procedures of 6.8.1 which do not meet the criteria of 6.8.3 for temporary changes shall be reviewed by the safety committee prior to implementation.

Contrary to the above, on October 22, 1987, the licensee changed 2-PT-211.6, Valve Inservice Inspection (Accumulator Isolation MOVs) to allow performance of the test with the Reactor Coolant System (RCS) depressurized. This changed the intent of the procedure which was to only allow performance of the test with the RCS at pressures between 800 and 1000 psig to prevent injection of the accumulator into the RCS. The change was implemented without prior safety committee approval and resulted in the injection of the Unit 2 C accumulator into the RCS.

This is a Severity Level IV violation (Supplement 1) and applies only to Unit 2.

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including (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.

FOR THE NUCLEAR REGULATORY COMMISSION


J. Nelson Grace
Regional Administrator

Dated at Atlanta, Georgia
this 4th day of January 1988