

## NOTICE OF VIOLATION

Virginia Electric and Power Company  
North Anna Unit 1

Docket No. 50-338  
License No. NPF-4  
EA 87-152

During the Nuclear Regulatory Commission (NRC) inspection conducted on July 15 - August 14, 1987, violations of NRC requirements were identified. 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 requires written procedures to be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1977.

Regulatory Guide 1.33 appendix "A", Section 5, requires written procedures for Abnormal, Off Normal, or Alarm Conditions.

The North Anna alarm response procedures "Main Steam Loops 1A-B-C Auxiliary Steam Loop High Radiation" and "Main Steam Loops 1A-B-C Auxiliary Steam Loop Radiation Alert" require the control room operator to notify Health Physics when alarms are received.

Contrary to the above, the written procedures were not implemented in that the control room operator did not notify Health Physics when the above alarms were received on July 15, 1987.

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

- B. Technical Specification 6.5.1.6.c requires that the Station Nuclear Safety and Operating Committee (SNSOC) shall be responsible for review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety. Technical Specification 6.5.1.7.b requires that the SNSOC shall render determinations in writing with regard to whether or not the above proposed changes or modification constitute an unreviewed safety question.

Contrary to the above, as of July 18, 1987, the SNSOC had not conducted required evaluations of two conditions which were abnormal and constituted changes to the steam generators in Unit 1. These conditions requiring evaluation were steam generator secondary side foreign objects and plant operation with leaking explosive steam generator tube plugs.

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

- C. 10 CFR 50 Appendix B XVI, Corrective Action, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, adequate measures were not taken to determine the cause nor were corrective actions adequate when steam jet air ejector radiation monitor 1-RM-SV-121 was restored to service in that, no functional or calibration test was run prior to returning the monitor to service following monitor failures on July 13 and 14, 1987.

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

- D. Technical Specification 4.3.3.11 states that each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated operable by performance of a daily channel check, a monthly source check, channel calibration during refueling, and quarterly channel functional test.

Technical Specification 1.17 states that a system, subsystem, train, component, or device shall be operable or have operability when it is capable of performing its specified function.

Contrary to the above, daily channel checks and monthly source checks for radiation monitor 1-RM-SV-121 were inadequate in that during July 1987 the acceptance criterion used for acceptable radiation monitor performance, i.e., free needle movement, was inadequate to verify that the radiation monitor was capable of performing its specified function or was operable.

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

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

Original signed by Mal Ernst/for

J. Nelson Grace  
Regional Administrator

Dated at Atlanta, Georgia  
this 5<sup>th</sup> day of October 1987