

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 29, 1989

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No 89-784
NAPS/DEQ/R3
Docket No. 50-338
50-339
License No. NPF-4
NPF-7

Gentlemen:

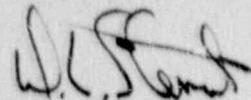
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/89-28 AND 50-339/89-28
RESPONSE TO THE NOTICE OF VIOLATION

We have reviewed your letter of October 30, 1989 which referred to the inspection conducted at North Anna on August 23, 1989 through September 25, 1989 and reported in Inspection Report Nos. 50-338/89-28 and 50-339/89-28. Our response to the Notice of Violation is attached.

This event was also discussed in Licensee Event Report 89-016-00 for Unit 1, dated September 8, 1989.

We have no objection to this correspondence being made a matter of public record. If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. J. L. Caldwell
NRC Senior Resident Inspector
North Anna Power Station

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RESPONSE TO THE NOTICES OF VIOLATION
REPORTED DURING THE NRC INSPECTION CONDUCTED
BETWEEN AUGUST 23, 1989 AND SEPTEMBER 25, 1989

INSPECTION REPORT NOS 50-338/89-28 AND 50-339/89-28

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted August 22 through September 25, 1989 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violation is listed below:

- A. Technical Specification 3.6.2.2 requires, in part, that the containment recirculation spray system be operable with four separate and independent containment recirculation spray subsystems, each composed of a spray pump, associated heat exchanger and flow path. Allowance is given by the action statement for one containment recirculation spray subsystem to be inoperable for up to 7 days or be in hot standby within the next 6 hours.

Contrary to the above, on August 26, the licensee rendered two containment recirculation subsystems inoperable for 47 minutes. This occurred due to the licensee's failure to correctly follow procedure 1-OP-49.6, Adjusting RSHX Isolation MOVs to Reduce Service Water Inleakage. The service water header "A" isolation valves, 1-SW-MOV-101A and B, were tagged closed and de-energized at the same time with the associated cross-tie between the "A" and "B" service water supply headers also isolated. This resulted in two of the four containment recirculation spray subsystems being inoperable.

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

RESPONSE TO VIOLATION

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The cause of the violation was miscommunication between the shift supervisor and personnel concerning the correct implementation of the tagout.

Periodic Test 1-PT-62.2.1 is performed at least weekly to determine that the Recirc Spray Heat Exchangers are being maintained in a dry lay-up condition. The performance of the test indicated that service water was leaking past the isolation valves into the heat exchangers. As a result, 1-OP-49.6, "Adjusting RSHX isolation MOVs to Reduce Service Water Inleakage", was initiated so that proper adjustments could be made to the MOVs to terminate the in-leakage. Since it was determined that the leakage was coming from the "A" service water header, the mechanical and electrical stops for the header isolation valves, 1-SW-MOV-101 A & 1-SW-MOV-101 B had to be adjusted. The tagout was prepared to de-energize both of the MOVs, however the procedural requirement to remove the valves from service sequentially was not adequately communicated from the Shift Supervisor to the personnel assigned to de-energize and tagout the MOVs' electrical power supplies. Therefore, both valves were removed from service concurrently and remained closed and de-energized for about 47 minutes.

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

Upon discovering that both valves were simultaneously closed and de-energized, power was reinstated to 1-SW-MOV-101B. Personnel involved in this event were reinstructed on the importance of correct communication and attention to detail when tagging components.

In addition, an operator was stationed in the Quench Spray Pump House basement during this event, in accordance with the Operating Procedure, to manually open the cross tie between the 'A' and 'B' SW headers in the event of a Design Basis Accident. Opening of the cross tie between the 'A' and 'B' SW headers will allow SW flow to all four RSHX.

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

Additional actions are not required to avoid further violations.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.