

**Virginia Electric and Power Company  
North Anna Power Station  
P. O. Box 402  
Mineral, Virginia 23117**

February 3, 2011

Attention: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Serial No.: 11-012  
NAPS: RAP  
Docket No.: 50-338  
License No.: NPF-4

Dear Sirs:

Pursuant to 10CFR50.73, Virginia Electric and Power Company hereby submit the following Licensee Event Report applicable to North Anna Power Station Unit 1.

Report No. 50-338/2010-005-00

This report has been reviewed by the Facility Safety Review Committee and will be forwarded to the Management Safety Review Committee for its review.

Sincerely,



N. Larry Lane  
Site Vice President  
North Anna Power Station

Enclosure

Commitments contained in this letter: None

cc: United States Nuclear Regulatory Commission  
Region II  
Marquis One Tower  
245 Peachtree Center Ave., NE, Suite 1200  
Atlanta, Georgia 30303-1257

NRC Senior Resident Inspector  
North Anna Power Station

JE22  
NRR

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

<b>1. FACILITY NAME</b> NORTH ANNA POWER STATION , UNIT 1	<b>2. DOCKET NUMBER</b> 05000 338	<b>3. PAGE</b> 1 OF 3
--	--------------------------------------	--------------------------

**4. TITLE**  
Unanalyzed Scaffolding Renders Charging Pump Inoperable Due to Human Error

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCUMENT NUMBER
12	12	2010	2010	-- 005 --	00	02	03	2011	FACILITY NAME	DOCUMENT NUMBER
										05000
										05000

<b>9. OPERATING MODE</b>  1	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §:</b> (Check all that apply)									
<b>10. POWER LEVEL</b>  100%	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)						
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER						
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)							

Specify in Abstract below or in NRC Form 366A

**12. LICENSEE CONTACT FOR THIS LER**

FACILITY NAME F. Mladen, Director Station Safety and Licensing	TELEPHONE NUMBER (Include Area Code) (540) 894-2108
---	--

**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b>	MONTH	DAY	YEAR

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On December 12, 2010, with Unit 1 in Mode 1, 100 percent power, the Unit 1 "A" Charging Pump was declared inoperable when scaffolding was discovered in the pump cubicle without Operations or Engineering reviews required for High Risk (seismic) scaffolding. This could have resulted in the failure of the pump if a seismic event had occurred. A review of operating logs indicated that, as a result of the scaffolding, the Unit 1 "A" Charging Pump was inoperable for a period greater than the Technical Specification allowed outage time. In addition, on November 9, 2010, with the Unit 1 "A" Charging Pump in service, the Unit 1 "B" Charging Pump was declared inoperable for approximately two hours to perform surveillance testing. This is also a condition prohibited by Technical Specifications. The cause of the event was human error in that the scaffold tracking program was inadvertently changed to indicate the scaffold had been removed. This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B) for a condition prohibited by Technical Specifications. This event posed no significant safety implications since a seismic event did not occur while the scaffolding was in place and redundant pumps were available at all times. Therefore, the health and safety of the public were not affected by this event.

LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET

1. FACILITY NAME  NORTH ANNA POWER STATION UNIT 1	2. DOCKET  05000 - 338	6. LER NUMBER			3. PAGE  2 OF 3
		YEAR 2010	SEQUENTIAL NUMBER --005 --	REV. NO. 00	

**NARRATIVE**

**1.0 DESCRIPTION OF THE EVENT**

On September 19, 2010, Unit 1 was in Mode 5 during a refueling outage with the Unit 1 "A" Charging Pump, 1-CH-P-1A (EISS System CB, Component P), tagged out. This pump also serves as a High Head Safety Injection (HHSI) Pump (EISS System BQ, Component P). Medium Risk Scaffolding (non-seismic) was erected in the pump cubicle for outage-related maintenance. Operations approval of the scaffold had the stipulations that the scaffold not be erected prior to entering Mode 5 and be removed prior to entering Mode 4. Per the scaffolding administrative procedure, only a Medium Risk scaffold was required with the pump tagged out and the Unit in Mode 5. High Risk (seismic) scaffolding would be required if the Unit was in Modes 1-4. On September 27, 2010, the scaffold tracking status was incorrectly updated to Removal Complete (RC) with the scaffold still erected in the field. Unit 1 entered Mode 4 at 0013 on October 10, 2010. On December 12, 2010, the Medium Risk (non-seismic) scaffolding was discovered in the pump cubicle, rendering the pump inoperable, but still available, for a period of time that exceeded the Technical Specification allowed outage time. In addition, on November 9, 2010, with the Unit 1 "A" Charging Pump in service, the Unit 1 "B" Charging Pump was declared inoperable for approximately two hours to perform surveillance testing. This is also a condition prohibited by Technical Specifications. The scaffold was removed on the day of discovery.

**2.0 SIGNIFICANT SAFETY CONSEQUENCES AND IMPLICATIONS**

This event posed no significant safety implications since a seismic event did not occur while the scaffolding was erected and redundant pumps were available at all times. Therefore, the health and safety of the public were not affected by this event.

This event is reportable pursuant to 10 CFR 50.73 (a)(2)(i)(B) for a condition prohibited by Technical Specifications.

**3.0 CAUSE**

The direct cause of this event was a human error (Inattention to Detail – Unawareness) in updating the status of the scaffold package in the tracking program caused either by poor work practices or communication. The human error was made by a supplemental employee, not currently employed at North Anna Power Station (NAPS), and the exact direct cause could not be determined. The human error prevented the scaffold from being identified as an erected scaffold requiring removal prior to entry into Mode 4.

The apparent cause of this event was an organization to program interface deficiency (Inadequate Program or Process Implementation) in that the electronic scaffold tracking function was not effectively implemented at NAPS. As a result, appropriate verification practices and supervisory oversight were not established over changes to the scaffold status to prevent a single human error from resulting in an event.

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

1. FACILITY NAME  NORTH ANNA POWER STATION UNIT 1	2. DOCKET  05000 - 338	6. LER NUMBER			3. PAGE  3 OF 3
		YEAR	SEQUENTIAL NUMBER	REV NO.	
		2010	--005 --	00	

**NARRATIVE**

**4.0 IMMEDIATE CORRECTIVE ACTION(S)**

The Technical Specification action was entered at the time the scaffolding was discovered in the Unit 1 "A" Charging Pump cubicle. The pump was placed in PULL-TO-LOCK with the Unit 1 "C" Charging Pump, powered by the "H" Emergency Bus, in service at the time and the associated actions were cleared. The scaffolding was removed from the pump cubicle and then the pump was returned to AUTO.

**5.0 ADDITIONAL CORRECTIVE ACTIONS**

The Scaffolding Order will be removed from a scaffold at the time of dismantling and shall be "in hand" when updating the status of that scaffold in the scaffold tracking program. Non-supervisory personnel will be required to obtain a second verification prior to updating scaffolding status. These process enhancements have been implemented.

The scaffold tracking function using electronic Scaffold Orders with electronic approvals and signatures will be fully implemented. The use of hard copy Scaffold Orders will be discontinued. This item will be tracked to completion via the Corrective Action System.

**6.0 ACTIONS TO PREVENT RECURRENCE**

The actions noted above are sufficient to preclude recurrence.

**7.0 SIMILAR EVENTS**

None.

**8.0 ADDITIONAL INFORMATION**

Unit 2 was in Mode 1, 100 percent power, at the time of this event and was not affected.