

November 3, 2003

MEMORANDUM TO: John A. Nakoski, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Stephen R. Monarque, Project Manager, Section 1 */RA/*  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: NORTH ANNA AND SURRY POWER STATIONS, UNITS 1 AND 2  
FACSIMILE TRANSMISSION OF ISSUES TO BE DISCUSSED IN A  
CONFERENCE CALL (TAC NOS. MB8046, MB8047, MB8048, AND  
MB8049)

A facsimile of questions to support a future conference call with the licensee regarding the licensee's submittal dated February 27, 2003, was transmitted to the licensee on October 3, 2003, to Mr. Tom Shaub of Virginia Electric and Power Company. In its submittal, the licensee proposed to revise the Operational Quality Assurance Program Topical Report. This memorandum and the attached questions do not convey or represent an NRC staff position regarding the licensee's request to revise the quality assurance program.

Docket Nos. 50-280, 50-281, 50-338, and 50-339

Attachment: Request for Additional Information

CONTACT: Stephen Monarque, NRR  
(301) 415-1544

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DATE	10/27/03	10/28/03	10/29/03

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DRAFT REQUEST FOR ADDITIONAL INFORMATION  
RELATING TO PROPOSED REVISION TO QUALITY ASSURANCE PROGRAM  
TOPICAL REPORT  
RENEWED LICENSE NOS. NPF-4, NPF-7, DPR-32, AND DPR-37  
VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA AND SURRY POWER STATIONS, UNITS 1 AND 2  
DOCKET NUMBERS 50-280, 50-281, 50-338, AND 50-339.

By letter dated February 27, 2003, Virginia Electric and Power Company (the licensee) requested changes to the Operational Quality Assurance Program (Topical Report) for the North Anna and Surry Power Stations. The NRC staff has completed an initial review of the submittal, and we have determined that additional information is necessary to complete this review.

1. In establishing its inspection program for modifications and maintenance activities, the licensee has committed to the guidance of Regulatory Guide (RG) 1.33, Revision 2 and RG 1.58, Revision 1. The licensee applies the guidelines of these regulatory guides and endorsed standards to nonroutine maintenance activities, but not to routine maintenance activities. Consequently, the licensee's proposed definition of nonroutine maintenance is a critical factor in implementing its inspection program.

The licensee proposes a definition of "nonroutine maintenance" as maintenance that occurs once in the life of a plant and that also requires special procedures. This definition effectively classifies all maintenance as routine. The proposed definition is not acceptable in that it does not address factors such as special processes, task complexity, qualifications of personnel performing the activity, or the adequacy of procedural guidance.

The licensee is requested to provide a definition of both "routine maintenance" and "nonroutine maintenance" that takes these factors into account. In addition, the licensee is requested to provide clarifying examples of routine and nonroutine maintenance activities.

2. The licensee proposes that routine maintenance activities be verified through peer inspections using independent or simultaneous verification. From this description, it can be inferred that when multiple maintenance personnel are assigned to a task, one member of the assigned maintenance crew may verify the quality of the activity. The licensee is requested to address the following items.
  - 2.1 Describe the general requirements of the peer review process and peer inspector qualification.

ATTACHMENT

- 2.2 Describe the process for ensuring that the peer reviewer is not engaged in the work activity.
- 2.3 Special processes fall under the licensee's definition of routine maintenance. Describe any additional controls related to verification of the quality of special process activities including a discussion on controls for peer verification of welding.