

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

May 30, 1986

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate No. 2  
Division of PWR Licensing-A  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Serial No. 86-326  
NO/TAH/acm  
Docket Nos. 50-280  
50-281  
50-338  
50-339  
License Nos. DPR-32  
DPR-37  
NPF-4  
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNITS NO. 1 AND 2  
NORTH ANNA POWER STATION UNITS NO. 1 AND 2  
IMPLEMENTATION OF IMPROVED EMERGENCY OPERATING PROCEDURES

By letter dated November 5, 1985, the NRC provided its evaluation of Virginia Electric and Power Company's Procedure Generation Package (PGP) for Emergency Operating Procedures (EOPs). During the week of May 5, 1986, the NRC performed an audit of the North Anna Power Station EOPs that had been developed based on the approved PGP and revision 1 of the Westinghouse Owners Group Emergency Response Guidelines (WOG ERGs).

The purpose of this audit, as identified in NRC letter dated April 9, 1986, was to "determine how well the NRC's process of reviewing PGPs is working as a method for assuring that acceptable EOPs are being developed and implemented by the licensees."

We encouraged the NRC's audit of our EOPs to identify problems prior to the implementation of the improved procedures. The audit identified a number of deficiencies in the procedures as well as certain weaknesses in the manner in which the PGP was implemented.

This letter serves to document the actions we intend to take in order to resolve the concerns identified by the audit team and to provide our schedule for completing these actions.

NORTH ANNA POWER STATION

In order to resolve the identified concerns, we intend to initiate a program utilizing outside qualified Human Factors and Engineering consultants to assist in:

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- 1) Review of the EOP Writers Guide to assure that proper human factors principles are being incorporated and make any appropriate changes.
- 2) Performing the detailed human factors review of the procedures as they are being rewritten.
- 3) Performing the review and verification to justify the use of the Westinghouse Owners Group Emergency Response Guidelines (WOG ERGs) and any step deviations from the WOG ERGs due to plant specific requirements.
- 4) Performing the validation of the EOPs and correcting any problems that may be identified. This will include reverification and revalidation for these changes.

These tasks will be performed with direct supervision from the plant personnel responsible for generating and maintaining the procedures.

The rewriting, verification and validation is expected to take four to six months. Following this, the licensed operators must be trained. This training is expected to take about ten weeks (5 operating shifts at two 4 day sessions each). The current Licensed Operator Retraining Program (LORP) will allow this training to begin in February, 1987.

Based on the above schedule, we intend to implement the improved EOPs by April 30, 1987.

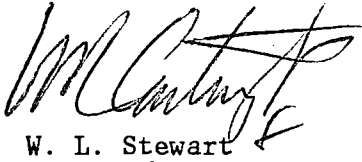
#### SURRY POWER STATION

The results of the audit were also reviewed against the Surry EOPs. Some concerns were identified. A review, verification and validation of the Surry EOPs will be performed in accordance with the Procedures Generation Program. This additional effort will include a Human Factors review of the procedure changes based on the training and engineering review. We intend to implement the Surry procedures by September 30, 1986.

The foregoing schedules supercede our previous schedules for implementing the improved EOPs as identified in our responses to Generic Letter 85-12, dated February 14, 1986 for North Anna and December 12, 1985 for Surry.

We appreciate the efforts of your staff and the valuable information gained as a result of the NRC audit of the North Anna EOPs. If you have any further questions on this matter, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'W. L. Stewart', with a stylized flourish at the end.

W. L. Stewart

cc: Dr. J. Nelson Grace  
Regional Administrator  
NRC Region II

NRC Senior Resident Inspector  
Surry Power Station

NRC Senior Resident Inspector  
North Anna Power Station

Mr. Chandu P. Patel  
NRC Surry Project Manager  
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