

VEPCO
NUCLEAR POWER STATION
QUALITY ASSURANCE MANUAL

50-280

SUBJECT:

2/10/78
CORRECTIVE ACTION

SECTION: 16
REV. NO.: 7
DATE: 2-10-78
PAGE 1 OF 52

APPROVED:

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EXEC. MGR.-LICENSING AND QUALITY ASSURANCE

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6.0 PROCEDURE

Conditions adverse to quality or defects in basic components must be identified by all Vepco personnel associated with the operation of the nuclear power stations. All Vepco personnel have the responsibility to report these conditions and the procedures described herein provide a means to report significant conditions adverse to quality to the appropriate levels of management. Prior to the issuance of the operating license for each nuclear unit, Sections 6.1, 6.2, 6.3 and 6.4 will not be implemented for that unit; the required reports will be accomplished in accordance with the Corporate Quality Assurance Manual Section 5.13.

6.1 Reporting of Deviations

To assure that deviations are investigated and processed in an expedient, orderly, and systematic manner, this procedure establishes definitions, guidelines, and detailed instructions for reporting such events.

6.1.1 Deviation

A deviation is defined as a significant difference between the expected value or condition and the measured or actual condition. There is no precise method to quantify the difference which constitutes a deviation; however, the following examples are illustrative of deviations:

- a. Any reportable occurrence as defined in the Technical Specifications.
- b. Any deviation discovered as a result of a calibration, periodic test, special test, start-up test, chemistry and HP, maintenance procedure or other station procedure.
- c. Significant instrumentation drifts, drift in trip setpoints, failure of instrument channels, etc.
- d. Failure to conduct a required periodic test within the allowable time frame.
- e. Exceeding thermal limitations as established in the Technical Specifications.
- f. A defect in a basic component which could, upon evaluation, contribute to a substantial safety hazard.
- g. Defects or failures to comply in a security system shall be considered to be a deviation. A defect or noncompliance in a security system is one which could allow access of an unauthorized individual to a vital area without being detected by the security system and requires a Part 21 report.

- 6.1.2 The Shift Supervisor shall be informed of all deviations, or nonconformances which may be deviations. He shall initiate appropriate action in accordance with this procedure.

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- 6.1.3 The Station Nuclear Safety and Operating Committee shall review all 14-day or 30-day Licensee Event Reports before written submittal to the Nuclear Regulatory Commission.
- 6.1.4 Processing a Deviation
- a. The individual identifying the deviation shall complete the "DEVIATION REPORT" in accordance with the attached instructions. This individual shall immediately report the deviation to his supervisor or, in his absence, to the Shift Supervisor.
 - b. For nonconformances resulting from receipt inspection of material or for items found defective after receipt inspection, a "NONCONFORMANCE REPORT" form shall be initiated and immediately forwarded to the cognizant supervisor.
 - c. The cognizant supervisor shall review the report and initiate any immediate corrective action required. The Shift Supervisor shall be immediately notified of all deviations or nonconformances.
 - d. The Shift Supervisor shall initiate a "DEVIATION REPORT" for those nonconformances determined to be deviations.
 - e. The Shift Supervisor shall review the deviation and determine its correct classification. If the deviation is deemed to be a Reportable Occurrence, as defined by Technical Specifications, it shall be reported immediately to the Operating Supervisor or the Superintendent-Station Operations or their designee. If the deviation is classified as nonreportable the Shift Supervisor shall so denote on the "DEVIATION REPORT". In the event that the deviation is not easily classifiable, the Assistant Operating Supervisor or Operating Supervisor shall be immediately notified to aid in the classification. Additional management and technical personnel may be consulted as necessary to classify the deviation. If there is any disagreement between the above listed personnel the Station Nuclear Safety and Operating Committee shall make the determination.
 - f. The Shift Supervisor shall review the deviation with regard to the Substantial Safety Hazard definition regardless of any other classification. As a result of this review, the Shift Supervisor may recommend a formal 10CFR21 review by the Station Nuclear Safety and Operating Committee to determine reportability.
 - g. If classified as a reportable occurrence, the Operating Supervisor, Superintendent-Station Operations, or designee shall immediately report the occurrence to the Station Manager.

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- h. For Reportable Occurrences requiring prompt NRC notification with written followup (hereafter referred to as "24 Hr. Report"), the Station Manager or his designee shall contact the Regional Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, within 24 hours after the occurrence is identified . (see para. 6.2)
- i. The Operating Supervisor shall present the "DEVIATION REPORT" to the Chairman-Station Nuclear Safety and Operating Committee promptly.
- j. Any Reportable Occurrence shall be promptly reported to the Chairman - Station Nuclear Safety and Operating Committee or his designee, the Executive Manager - Licensing & Quality Assurance, the Director - Nuclear Operations, and the Chairman - System Nuclear Safety and Operating Committee. The notification to these individuals may be made by telephone or other telecommunications as practicable (see para. 6.2). The Executive Manager - Licensing and Quality Assurance, or his designee shall make the determination whether additional reporting is required within Vepco or to the NRC Division of NRR depending upon whether issuance of licenses or amendments to licenses are imminent.
- k. If the deviation is classified as a Reportable Occurrence requiring a written report to the NRC within 30 days (hereafter referred to as "30 Day Report"), it shall be forwarded to the Operating Supervisor. He shall present the "DEVIATION REPORT" to the Station Nuclear Safety and Operating Committee.
- l. If a 10CFR Part 21 evaluation has been recommended by the Shift Supervisor, the "DEVIATION REPORT" shall be presented to the Station Nuclear Safety and Operating Committee promptly, regardless of any other classification. This evaluation shall be completed as soon as practicable but in any event within 5 calendar days.
- m. The Chairman of the Station Nuclear Safety and Operating Committee (SNSOC) may appoint a subcommittee of two or more members. The subcommittee shall be responsible for assuring that the occurrence is investigated and shall prepare a draft Licensee Event Report (LER) for submittal to the SNSOC before a LER is sent to the NRC.
- n. If the deviation is classified by the SNSOC as a non-reportable deviation, the "DEVIATION REPORT" shall be forwarded to the cognizant supervisor who has the responsibility for the equipment or personnel to which the deviation applies. The cognizant supervisor shall review the report and denote corrective action taken or scheduled on the "DEVIATION REPORT" to the Operating

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Supervisor. The Operating Supervisor shall present the "DEVIATION REPORT" to the Station Nuclear Safety and Operating Committee for review, preferably at the next scheduled meeting.

- o. If the deviation is classified by the SNSOC as a violation, significant safety-related deviation, or Reportable Occurrence, it shall be so noted under "comments".
- p. The Station Nuclear Safety and Operating Committee (SNSOC) shall review the Licensee Event Report and shall make recommendations to prevent recurrence to the Station Manager, Director - Nuclear Operations and Chairman - System Nuclear Safety and Operating Committee. The draft of the report shall also be forwarded to the Director - Nuclear Operations, who shall be responsible for preparing the submittal to the NRC.
- q. Items concerning nuclear units under construction which are handled as potentially reportable items under 10CFR Part 21 or 10CFR 50.55(e) and may be applicable to operating units shall be evaluated for applicability and reportability by the operating staff. Conversely, items discovered at operating stations may apply to units under construction shall be brought to the attention of the Project Engineer.
 - (1) When an item involves an operating unit, the Project Engineer or his designee will have a copy of Form #883.8C, along with supporting documentation, hand carried to the Director of Nuclear Operations or his designee. A copy of the information will then be called or telecopied to the Station Managers at North Anna and Surry as appropriate by the Director, Nuclear Operations or his designee. The item will then be evaluated for reportability in accordance with the station's Technical Specifications and applicable regulations. (See Corp. QA Manual, QAM-5.13, para. 6.7)
 - (2) Deviation reports originating at operating stations which are reportable will be telecopied to the Director of Nuclear Operations as soon as reportability is determined. The Director of Nuclear Operations or his designee will determine if the deviation is considered potentially reportable for construction units, the deviation form and any additional information will be hand carried to the Project Engineer for stations under construction and the Executive Manager - Licensing & Quality Assurance (EM - LQA). The EM - LQA has already been orally notified (see para. j).

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- r. The Station Nuclear Safety and Operating Committee shall review all deviations, including Reportable Occurrences and non-reportable deviations. The Chairman may assign a subcommittee to investigate the cause of a Reportable Occurrence and to propose corrective action to prevent recurrence, if deemed appropriate.
- s. If a substantial safety hazard as defined in 10CFR21 is determined to exist, the Chairman - Station Nuclear Safety and Operating Committee, or his designee, shall promptly report the condition to the Director - Nuclear Operations and the NRC Region II. The Director - Nuclear Operations shall notify the Vice President - Power Supply and Production Operations and the Executive Manager - Licensing and Quality Assurance. The notification to these individuals may be made by telephone or telecommunications as practicable. The Director - Nuclear Operations shall be responsible for preparing the substantial safety hazard follow-up report.
- t. The 10CFR Part 21 report of the substantial safety hazard to the NRC must be made within 48 hours after the Vice President - Power Supply and Production Operations has been notified. A written report (see form letter attached) shall be forwarded to the NRC within 5 days.

6.2 Reportable Occurrences (Licensee Event Reports)

6.2.1 Reportable occurrences, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

- a. Prompt Notification with Written Followup. The types of events listed below shall be reported as expeditiously as possible, but within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the appropriate Regional Office or

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- d. Memorandums associated with the occurrence.
- e. Draft of the Licensee Event Report reviewed by the Station Nuclear Safety and Operating Committee.
- f. Final copy of the report forwarded to the Director - Nuclear Operation.
- g. Copy of memorandum to the Director - Nuclear Operation used to forward the final report to him.
- h. Copy of System Description, drawings, manufacturer's manuals, etc., which were used in investigating or reporting the occurrence.
- i. Reference to telephone conversation, etc.
- j. All other material used in formulating report.
- k. A copy of the actual report and cover letter signed by the Vice President-Power Supply and Production Operations, or designee, shall be retained.

The Secretary of the Station Nuclear Safety and Operating Committee shall maintain a list of "Outstanding Items" which shall include a listing of all incomplete requirements/commitments noted in Licensee Event Reports.

6.3 10CFR Part 21 (Substantial Safety Hazard Reports)

- 6.3.1 10CFR Part 21 requires that defects in a facility, activity or basic component which could result in a substantial safety hazard or failure of a facility, activity, or basic component to comply with the regulations relating to a substantial safety hazard be reported to the NRC.
- 6.3.2 Deviations shall be reviewed and evaluated to determine whether the deviation could be a substantial safety hazard.
- 6.3.3 The determination of substantial safety hazard status shall be considered a preliminary evaluation until the review and determination by the Station Nuclear Safety and Operating Committee.
- 6.3.4 The time period from when the Responsible Officer is notified that a 10CFR Part 21 report must be made until the Nuclear Regulatory Commission is notified shall not exceed 48 hours. A written report must follow the 48 hour verbal report within 5 days after the decision has been made. A typical letter format for the written 5 day report is included as an attachment to this section.

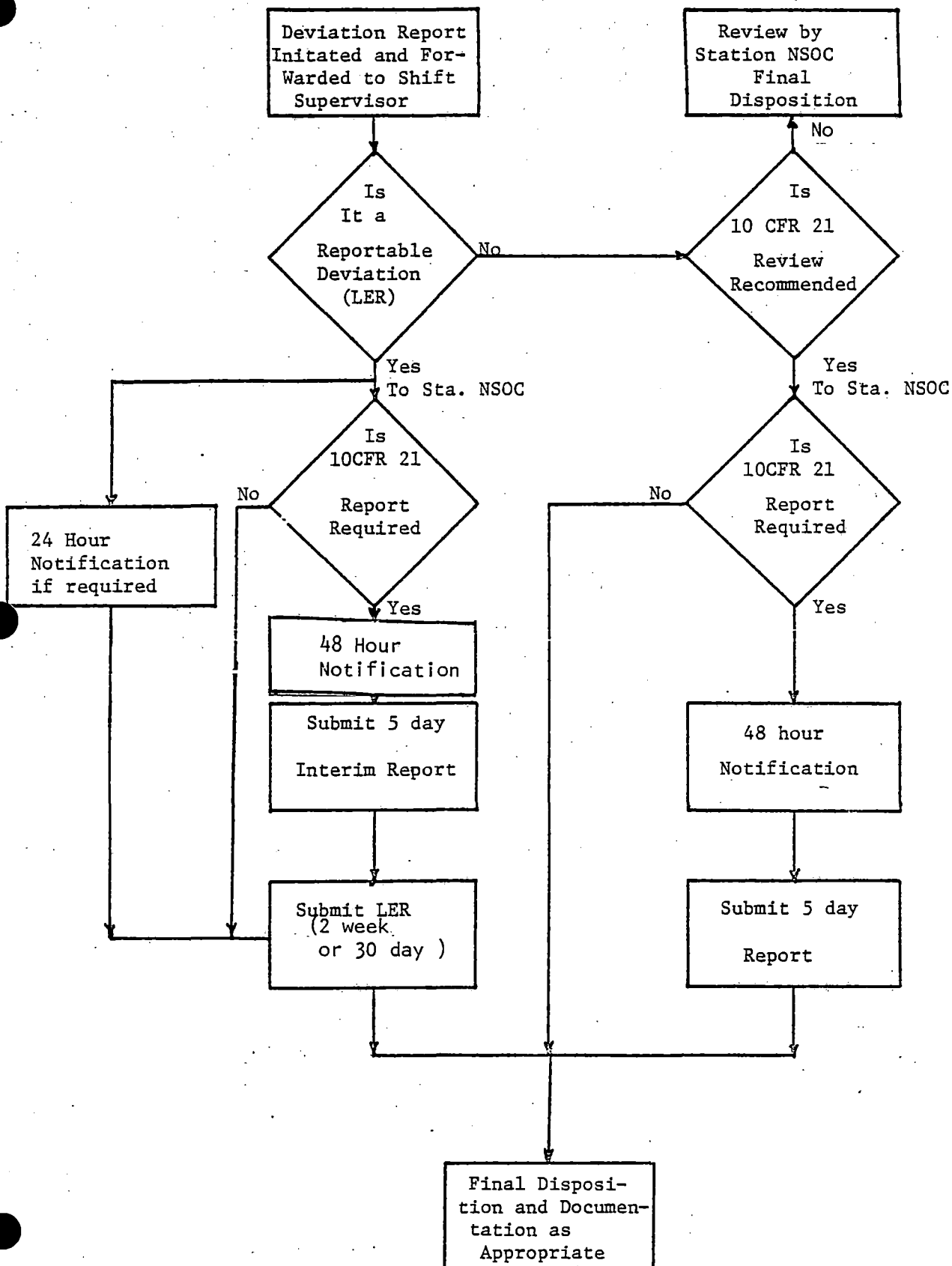
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- 6.3.5 Defects in items procured for use in a Category I system, structure or component shall be considered to be within the scope of this procedure if:
- a. the item has been accepted by receipt inspection and made available for use.
 - b. the item has been found to be defective and not released for use, however identical components are performing safety related functions in the Category I Systems, Structures or Components.
- 6.3.6 Items found defective during receipt inspection or after installation as a replacement component shall be described in detail on the "Nonconformance Report" form.
- 6.3.7 The "Nonconformance Report" form shall be forwarded to the Shift Supervisor for evaluation and submittal of a "Deviation Report".
- 6.3.8 Items placed on "QC Hold" for other than physical defects shall not be included in the scope of this procedure.
- 6.3.9 Service organizations and other software shall be receipt inspected and are within the scope of the 10CFR21 reporting requirements if defects are discovered.
- 6.3.10 All Deviation Reports resulting in 10CFR Part 21 with associated documents (Nonconformance Reports, etc.) shall be filed as a permanent record and shall include all notification dates and times.
- 6.3.11 The posting requirements and specific marking of Procurement Documents concerning the application of the provisions of 10CFR Part 21 to the procurement cycle shall be implemented as specified in 10CFR Part 21.31.
- 6.3.12 For those items found to be defective upon receipt inspection and it is determined that no identical components exist in the Category I Systems, Structures or Components, the following action will be taken:
- a. The Supervisor of the area responsible for ordering the part shall identify, in writing to the vendor, the following information:
 - (1) Part Identification
 - (2) Stock numbers, model or material identification
 - (3) Description of the defect
 - (4) Any other information deemed to be appropriate



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- b. A copy of this notification shall be attached to the Receipt Inspection Report and other pertinent procurement documents, and filed as a permanent record.

6.3.13 For substantial safety hazards that are reported jointly with a Licensee Event Report, the reporting requirements of the Technical Specifications shall be preserved (i.e. 24 hour notification with a written 2 week or 30 day followup report).

6.3.14 All files associated with the notification of the NRC resulting from the 10CFR21 reporting requirements shall be maintained by the Director - Nuclear Operations. In addition, a file associated with the review and disposition of Licensee Event Reports evaluated by the Station Nuclear Safety and Operating Committee shall be maintained in the Station Records Vault.

6.3.15 The Director - Quality Assurance shall maintain an audit program to verify that the identification, evaluation and reporting of deficiencies is being carried out in accordance with this procedure.

6.4 Reactor Shutdowns and Trips

To assure that reactor shutdowns are documented sufficiently to provide information which may be subsequently needed for reports or statistical data, all shutdowns shall be documented by a "REACTOR SHUTDOWN AND TRIP REPORT". If a deviation, as defined above is the cause of, or occurs during a shutdown, a "DEVIATION REPORT" shall also be initiated.

6.5 Maintenance Program

A maintenance program is in effect for each operating nuclear power station to maintain safety-related equipment. The program includes maintenance of mechanical, instrument, and electrical equipment.

6.5.1 Responsibility

- a. The Supervisor-Electrical Maintenance shall be responsible for the electrical maintenance program.
- b. The Supervisor-Mechanical Maintenance shall be responsible for the mechanical maintenance program.
- c. The Superintendent-Station Operations shall be responsible for coordinating electrical and mechanical maintenance and related operational aspects.
- d. The Instrument Supervisor shall be responsible for all instrument maintenance.

No. 888.94C

DEVIATION REPORT
SURREY POWER STATION. (Same for North Anna)
VIRGINIA ELECTRIC AND POWER COMPANY

1 Shift Supervisor			
2 Unit No:	3 Date:	4 Time:	5 Report No:
6 System:	7 Component:	8 Mark No.:	9
Description of Deviation:			
10 Power (%)	11 Load (MWE):	12 RX. Temp:	13 RX. Press:
14 Control Mode:	<input type="checkbox"/> Manual	<input type="checkbox"/> Automatic	<input type="checkbox"/> Load Dispatch
15 Reactor Status:			
<input type="checkbox"/> Critical <input type="checkbox"/> Startup <input type="checkbox"/> Cold Shutdown <input type="checkbox"/> Intermediate Shutdown			
<input type="checkbox"/> Hot Shutdown <input type="checkbox"/> Steady <input type="checkbox"/> Maneuver <input type="checkbox"/> Pulling rods Mode			
16 Cause Description:			
17 Principal Personnel:			
Shift Supervisor		Control Room Operator	
Asst. Shift Supervisor		Asst. Control Room Oper.	
Other			
18 Initial Action:			
19 Maintenance Report Submitted (No.):			
20 Recommended Corrective Action:			
21 Report Submitted By:			
22 Date:			

IMMEDIATELY FORWARD TO SHIFT SUPERVISOR

23 Classification:		<input type="checkbox"/> 30 Day Report		<input type="checkbox"/> Yes Recommended	
<input type="checkbox"/> Nonreportable Deviation		<input type="checkbox"/> 24 Hour Report		<input type="checkbox"/> No 10CFR21 Review	
24 Shift Supervisor Signature:		25 Date:		26 Time:	
27 Classification Verified by Operating Supervisor:		28 Date:			
29 Notification Record for 24 Hour Reports: (Notification to NRC required within 24 hours of occurrence).					
<input type="checkbox"/> NRC - Region II, () repr.		Date		Time By	
<input type="checkbox"/> Operating Supervisor		Date		Time By	
<input type="checkbox"/> Station Superintendent		Date		Time By	
<input type="checkbox"/> Station Manager		Date		Time By	
<input type="checkbox"/> Director - Nuclear Operations		Date		Time By	
<input type="checkbox"/> Exec. Manager - LQA		Date		Time By	
<input type="checkbox"/> Chairman - System Committee		Date		Time By	

No. 888.958

DEVIATION REPORT
SURREY POWER STATION (Same for North Anna)
VIRGINIA ELECTRIC AND POWER COMPANY

Investigation responsibility assigned to:	30	Date:	31	Report No.:	32
Date report due to Richmond office:	33	Date report due to NRC			34
Report completed by:			35	Date:	36

Nonreportable Deviation

Reason not reportable:	37		
Date completed:	38	Date to be completed:	39
Cognizant Supervisor:	40	Date:	41

Review by Station Nuclear Safety and Operating Committee: 42

Review Results:	43

10 CFR 21 Notification 44

Director - Nuclear Operations	Date: _____	Time: _____	By: _____
Executive Manager - LQA	Date: _____	Time: _____	By: _____
Vice President - Power Supply & Production Operations	Date: _____	Time: _____	By: _____
NRC Region II	Date: _____	Time: _____	By: _____

10 CFR 21 Report Required ☐ Yes ☐ No 45

Chairman's Signature:	46	Time:	47	Date:	48
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Copy to: (if classified as violation, significant safety-related deviation or reportable occurrence) 49

Manager - Power Station

Director - Nuclear Operations

Chairman - System Nuclear Safety and Operating Committee