

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

JUN 26 1981

June 22, 1981

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 342
NO/RMT:ms
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of May 28, 1981 in reference to the inspection conducted at North Anna Power Station between April 6 - May 5, 1981 and reported in IE Inspection Report Nos. 50-338/81-13 and 50-339/81-10. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

B. R. Sylvia
B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

City of Richmond

Commonwealth of Virginia

Acknowledged before me this 22nd day of June, 1981

Ann C. Mizer
Notary Public

My Commission expires: 2-26, 1985

SEAL

cc: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM APRIL 6 - MAY 5, 1981

NRC COMMENT

Technical Specification 6.4 requires retraining and replacement training programs be maintained in accordance with Section 5.5 of ANSI N18.1-1971. Section 5.5 of ANSI N18.1-1971 requires a training program which maintains the proficiency of the operating organization. Section 5.1 of ANSI N18.1-1971 further identifies the requirement for the training program to provide fully trained and qualified personnel to ensure safe and efficient operation of the facility.

Contrary to the above, replacement and retraining programs were deficient for the operating organization in that:

- a. Unlicensed operators do not receive formal training on systems or procedures they use in conduct of operations prior to assignment as qualified operators. Additionally, any on the job training received is not specified nor documented.
- b. The engineering staff has no formal training program for development, retraining, or certification of personnel.

RESPONSE

1. ADMISSION OR DENIAL OF ALLEGED VIOLATION

The Notice of Violation is not correct as stated.

2. REASONS FOR THE VIOLATION

ANSI N18.1-1971, Sections 5.1 and 5.5, requires a training and retraining program that will provide fully trained and qualified personnel to ensure the continued safe operation of the facility. The existing "Step Program" for non-licensed operators including an end-of-step examination, supervisor's appraisal and a productive work evaluation provides for, and documents, this training and retraining. This program, administered by Station Management and the on-site Training Department, provides for the necessary knowledge and experience level of personnel prior to the assignment of specific tasks or responsibilities. Operational experience has verified the acceptability of the present training and retraining program for non-licensed operators.

However, the training program for Station engineers is not clearly defined and the documentation for specific on-the-job training tasks for non-licensed operators is lacking. We believe that this Notice of Violation was solely based on these problems. Therefore, our corrective actions will be directly toward the resolution of these NRC identified areas of concern.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A task analysis survey which will identify the necessity for qualification training and retraining in these areas is expected to be completed by December 31, 1981. Until these task analyses are completed and implemented, the following actions are being taken.

a. Non-Licensed Operations Personnel

A qualification card system specifying the minimum qualification level necessary for conducting the various non-licensed activities in support of station operation is being developed. These cards will be signed when the person has demonstrated sufficient knowledge and experience to carry out assigned duties. Upon completion of the entire qualification card, the person will then be designated as a qualified operator for that area. Retraining of qualified non-licensed operators in a particular area will be a continuation of experience and knowledge accumulation resulting from on-the-job training as required by the step program. At the end of each step, the operators, will as before, receive a Productive Work Evaluation, a supervisor's appraisal and an end-of-step examination.

b. Station Engineering Personnel

All full time station engineers are presently being scheduled for STA training, SRO license training or basic systems training that will meet the minimum qualification requirements of ANSI N18.1. Retraining of engineers will be consistent with the existing STA and SRO retraining programs until the task analyses identify specific areas of qualification training and retraining.

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

The actions described above should preclude further alleged violations.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

This program, as described, for non-licensed operator qualification will be established by August 1, 1981 and will be fully implemented by October 1, 1981.

The engineer's training program has already been initiated. It is anticipated that the minimum qualification training for all station engineers will be defined by December 31, 1981.