

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

July 12, 1994

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

Serial No. 93-405A  
NL&P/EJW  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNITS 1 and 2  
SUPPLEMENTAL INFORMATION FOR PROPOSED TECHNICAL  
SPECIFICATIONS CHANGES TO ADMINISTRATIVE CONTROLS -  
PERIODIC REVIEWS OF PROCEDURES

As a result of our meeting with the NRC on June 14, 1994, the following supplemental information is being provided concerning our Technical Specification change request (Letter Serial No. 93-405, dated July 8, 1993) to eliminate the periodic review of specified procedures. This supplemental information more specifically addresses the December 21, 1992, internal guidance provided to the NRC Regional Directors of Reactor Safety. It also addresses the Virginia Electric and Power Company's (Virginia Power's) implementation methodology. Each of the four considerations in the internal NRC guidance is discussed below.

- Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI N18.7/ANS 3.2 which is endorsed by RG 1.33.

The NRC approved Operational Quality Assurance Program (Company Position 15 to NRC Regulatory Guide 1.33/ANSI N18.7-1976) and administrative controls require applicable procedures, as determined by station management, to be reviewed following an accident, an unexpected transient, significant operator error, or equipment malfunction.

ADD 1/0

- Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.

Certain symptom and event driven procedures will continue to be reviewed periodically as required by the Code of Federal Regulations and/or other commitments. These include the "non-routine" procedures discussed in the NRC guidance of December 21, 1992 (e.g., Emergency Operating Procedures, Abnormal Procedures, Emergency Plan Implementing Procedures, Annunciator Response Procedures, Fire Protection Plan, Oil Spill Prevention, Control, and Countermeasure Plan, Security Plan Implementing Procedures, Security Contingency Plan Implementing Procedures, and other procedures which have specific regulatory requirements for periodic reviews). The frequency of these periodic procedure reviews is determined by other regulatory requirements and previous commitments (e.g., The Emergency Plan Implementing Procedures are reviewed annually in accordance with 10 CFR 50 Parts 50.47, 50.54, and Appendix E. The Oil Spill Prevention, Control, and Countermeasures Plan is reviewed at least once every three years in accordance with 40 CFR 112. The Emergency Operating Procedures are reviewed at least once every four years in accordance with NRC letter dated August 27, 1991, although each of these procedures is typically reviewed once every two years through simulator or classroom training, etc.).

- At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

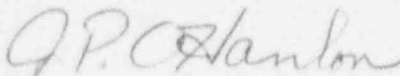
Although an audit of programmatic controls for procedures is not specifically performed, we feel that the intent of the NRC's guidance is being met by required audits of functional areas. Audits of nuclear programs are conducted in accordance with the Technical Specifications and the approved Operational Quality Assurance Program. Each audit of a functional area includes a review of procedures for the area being audited. These reviews evaluate the adequacy of procedures as well as their implementation. Furthermore, significant problems associated with Virginia Power's procedure review and revision process would be observed as performance and/or compliance issues in the nuclear programs' procedures and identified through program audits, assessments, or other established corrective action programs (e.g., quarterly station deviation report trend reports, Human Performance Evaluation System, etc.). As such, a separate requirement for a biennial audit of procedures is not warranted. Additionally, if concerns are noted, QA management has the flexibility to either issue a finding or station

- deviation report, or to schedule and conduct a separate audit or assessment of the procedure review and revision process when and if deemed necessary.
- Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

Though not explicitly mentioned in our original Technical Specifications' change request, each significant work activity at North Anna and Surry Power Station is preceded by a pre-job briefing which is required by administrative procedures. The purpose of that briefing is to assess the scope of work and verify adequate preparation prior to commencement of the work activities. Significant evolutions are practiced or verbally walked through to ensure that personnel understand and are familiar with the procedure. The briefing includes a review of the applicable procedure(s). Any problems identified with either the adequacy or implementation of procedures are addressed at that time. In addition, administrative controls governing modifications to plant equipment, industry events, station events, and NRC and INPO correspondence require that potentially affected procedures be identified and revised as necessary.

Should you have any questions or require additional information, please contact us.

Very truly yours,



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