

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

83 NOV 31 A10:48
November 23, 1983

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

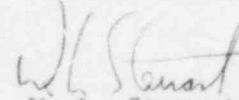
Serial No. 644
NO/JHL:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of October 28, 1983 in reference to the inspection conducted at North Anna Power Station between June 11 and July 5, 1983 and reported in IE Inspection Report Nos. 50-338/83-17 and 50-339/83-17. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report 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,


W. L. Stewart

Attachment

cc: Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing

Mr. M. B. Shymlock
NRC Resident Inspector
North Anna Power Station

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/83-17 AND 50-339/83-17

NRC COMMENT:

"10 CFR 50, Appendix B, Criterion VIII and the accepted QA Program, which commits to ANSI N45.2.2 require that measures shall be established for identification and control of materials. These measures shall assure that identification of the item is maintained."

"Contrary to the above, Category 1 material stored in the construction area of the Technical Support Center was not identified or controlled in a manner that would ensure identification."

"This is a Severity Level V Violation (Supplement 1), and applies to Units 1 and 2."

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated. Category 1 seismic conduit supports and unistrut materials staged in the Technical Support Center prior to installation were, in part, missing QC acceptance identification tags. The rope barricade and CAT-1 signs were not properly placed at the time of inspection.

(2) REASON FOR VIOLATION:

The level of construction activity in the Technical Support Center area necessitated moving the Category 1 staging area periodically resulting in the loss of some tags and the lack of rigidity in the barricade.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

All materials not needed immediately or unidentifiable were removed, the area cleaned and the barricades stiffened. All non Category 1 materials were removed from the area. QC inspectors were present to verify identification of materials and condition of the area. A discussion of controls required for Category 1 materials took place July 11, 1983 at the weekly safety meeting attended by all craftsmen and supervisors.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The controls necessary to provide for maintaining identification and restricting accessibility in areas where Category 1 materials are staged are being identified, in detail, in a Site Operating Procedure presently being generated. This procedure will provide for periodic monitoring of areas by supervisory personnel. This is in addition to the monitoring being provided by QC. It is expected that this procedure will be issued January 1, 1984. In addition, the requirements of Category 1 materials in staging areas will be reviewed quarterly with all craft and supervisory personnel at a weekly safety meeting.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

It is expected that the continuing reviews with all personnel will prevent recurrence. The Site Operating Procedure will be fully implemented by January 31, 1984.