

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

November 18, 1983

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

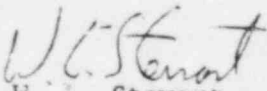
Serial No. 626
NO/JHL:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of October 19, 1983 in reference to the inspection conducted at North Anna Power Station between July 6 and August 5, 1983 and reported in IE Inspection Report Nos. 50-338/83-18 and 50-339/83-18. 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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PDR ADOCK 05000338
Q PDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/83-18 AND 50-339/83-16

NRC COMMENT:

Technical Specification 6.8.1 requires written procedures to be established, implemented, and maintained.

Contrary to the above, the following procedures were not implemented:

- RWP-83-ST-27 was not followed on July 13, 1983, in that a worker entered a radiation area without the proper protective clothing.
- EMP-P-RT-125 and EMP-P-RT-127 sections on 86-25H6 and 86-25H7 lockout relays were not properly functionally checked, on August 3, 1983.
- EMP-P-RT-208 checkout procedure was not correctly implemented on the 86-25H6 and 86-25H7 lockout relays in that it did not list the proper reference material, which made it impossible to comply with.

This is a Severity Level V Violation (Supplement I), and applies to Unit 2 only.

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

(2) REASONS FOR VIOLATION:

The failures cited were due to personnel error. The Radiation Work Permit for the access to the basement of the Quench Spray Pumphouse was revised. The Operator did not review the new RWP and acknowledge its change as required prior to entry.

The failure to properly execute the provisions of the Electrical Maintenance Procedures and provide the necessary follow-up of documenting deficiencies was due to the technicians unfamiliarity with the established document and deficiency control program. These technicians were from the System Protection Control Operations Group and although they had completed the General Employee Training, they were not properly instructed or supervised in how to handle these events.

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

The personnel involved in each of these events were counseled and reinstructed in the need for adherence to procedures.

The deficiencies noted on the checkout procedure (EMP-P-RT-208) have been corrected by procedure revision.

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/83-18 AND 50-339/83-18

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

The System Protection Supervisor has been instructed to provide closer surveillance of the work activities of support service personnel under his cognizance and to ensure assigned personnel are aware of the requirements for procedural adherence.

The failure to adhere to the posted RWP appears to be an isolated event. All Station Personnel are trained and periodically retrained in the requirements for adherence to posted RWP's. In addition, the need to review RWP's every time an area is entered, to become aware of changes, is emphasized. Therefore no further corrective actions are necessary.

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

Full compliance has been achieved.