

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

March 30, 1984

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

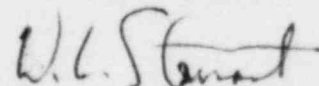
Serial No.: 134
REB: vgv/153/LM4
Docket Nos.: 50-338
50-339
License Nos.: NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of March 1, 1984, in reference to the inspection conducted at North Anna Power Station between January 25, 1984 and January 27, 1984 and reported in IE Inspection Report Nos. 50-338/84-02 and 50-339/84-02. Our response to the specific infractions are 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. Richard C. Lewis, Director
Division of Project and Resident Programs

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

Mr. M. W. Branch
NRC Resident Inspector
North Anna Power Station

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/84-02 AND 50-339/84-02

NRC COMMENT:

1. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(10) requires that the licensee's emergency plans include a range of protective actions, consistent with Federal guidance, for the plume exposure pathway EPZ for emergency workers and the public.

The Federal guidance on protective actions to be recommended to offsite officials for general emergencies is addressed in Appendix 1 of NUREG-0654/FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Response Plans and Preparedness in Support of Nuclear Power Plants." This guidance is clarified by IE Information Notice No. 83-28: "Criteria For Protective Action Recommendations for General Emergencies."

Contrary to the above, in the case where prompt protective action recommendations are warranted by plant conditions and site boundary doses are not projected or occurring, the licensee's Emergency Plan and associated Implementing Procedures do not require consideration of protective action recommendations consistent with Federal guidance.

This is a Severity Level IV violation (Supplement I) and applicable to all units.

RESPONSE:

1. Admission Or Denial Of The Alleged Violation:

The violation as stated is partially correct.

The North Anna Emergency Plan, Section 6, Emergency Measures and Implementing Porcedure EPIP-1.05, Response to General Emergency, require consideration of protective action recommendations. However, EPIP-2.01, Notification of State and Local Governments, if performed mechanically would not provide for communication of protective action recommendations for General Emergencies which do not involve release of radioactive material.

2. Reasons For Violation:

This shortcoming in EPIP-2.01 occurred when the procedure was revised on May 24, 1983, to remove the protective action recommendations listed on the "Report of Emergency to State and Local Governments" form (Attachment 1 to EPIP-2.01). The protective action recommendations were added to the "Report of Radiological Conditions to the State" form (Attachment 2 to EPIP-2.01), which is used exclusively by the Commonwealth of Virginia. This action was taken at the request of State officials to allow them the prerogative of final decision on protective action measures for local areas. In revising the procedure we neglected to provide procedurally for communication of protective action recommendations to State officials when release of radioactive material was not a concern.

3. Corrective Steps Which Have Been Taken And The Results Achieved:

EPIP-2.01 was revised and approved by the Station Nuclear Safety and Operating Committee on March 7, 1984. This revision provides for communicating protective action recommendations to State officials for all conditions of a General Emergency.

4. Corrective Steps Which Have Been Taken To Avoid Further Violations:

Future revisions to the Emergency Plan Implementing Procedures will be more carefully examined to ensure that the entire section or procedure is adjusted relative to any change of one segment of that section or procedure.

5. The Date When Full Compliance Will Be Achieved:

Corrective actions have been completed.

NRC COMMENT:

2. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirement of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training.

Section 5.0 of the North Anna Emergency Plan states, in part, that recommendations for protective actions will be made by the Station Emergency Manager. Section 5.0 also states, in part, that after declaring an emergency, the Shift Supervisor becomes the Station Emergency Manager.

Contrary to the above, as evidenced by interviews with Shift Supervisors during the inspection, adequate training had not been provided Shift Supervisors for EPIP-1.05, relating to protective action recommendations.

NRC COMMENT: (continued)

This is a Severity Level IV violation (Supplement I) and applicable to all units.

RESPONSE:

1. Admission Or Denial Of The Alleged Violation:

This violation is correct as stated.

2. Reasons For Violation:

Shift Supervisors were not adequately trained in the use of EPIP-1.05 as it pertains to protective action decision-making. Though EPIP-1.05 was reviewed by the instructor during formal classroom training (1983), insufficient emphasis was placed on protective action recommendations. In addition, Shift Supervisors were not required to implement or perform EPIP-1.05 as a part of their Emergency Preparedness training. As they were not exercised in providing protective action recommendations for emergency scenarios mandating this type of response, they were unfamiliar with this information as it is presented in the implementing procedure.

3. Corrective Steps Taken And Results Achieved:

During the current or next cycle of Operator continuing training, EPIP-1.05 will be distributed to Shift Supervisors and Senior Licensed Operators for their review. Information pertaining to protective action recommendations will be discussed during formal classroom training, and they will be directed to provide the appropriate protective action recommendation for a scenario given by the instructor.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations:

As part of the Operator Continuing Training Program (Simulator), Shift Supervisors and Senior Licensed Operators will periodically be given scenarios in which they will be required to assume the duties of Station Emergency Manager. These individuals will then be expected to initiate and perform EPIP-1.05, and to provide the appropriate protective action recommendation for the exercise given.

5. Date When Full Compliance Will Be Achieved:

Corrective Actions will be completed by May 26, 1984.