

85 JUN 24 10:03



VIRGINIA POWER

June 18, 1985

Dr. J. Nelson Grace
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No. 85-381
NO/jhl/acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

We have reviewed your letter of May 13, 1985, in reference to the inspection conducted at North Anna Power Station from April 8 to April 12, 1985, and reported in IE Inspection Report 50-338/85-11 and 50-339/85-11. Our responses to the Notices of Violation are addressed in the attachment.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power 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. Roger D. Walker, Director
Division of Project and Resident Programs

Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch No. 3
Division of Licensing

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

8507110072 850618
PDR ADOCK 05000338
G PDR

IEOI

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM APRIL 8 TO APRIL 12, 1985
REPORT NOS. 50-338/85-11 AND 50-339/85-11

NRC COMMENT:

10 CFR 50.54(a)(1) requires Virginia Electric and Power Company (VEPCO) to implement their Quality Assurance Program described in its Safety Analysis Report. Section 17.2.6 of the VEPCO Quality Assurance Program requires that procedures, instructions, and drawings be reviewed to assure they are adequate and contain quality requirements. Administrative Procedures 16.8, 5.3 and 5.4 further amplify review requirements.

Contrary to the above, the reviews of Electrical Maintenance Procedures EMP-P-EP-8 and 8A were inadequate in that several errors and inaccuracies (typographical errors, figure numbers not compatible with text, and figures difficult to read) were identified.

This is a Severity Level V Violation (Supplement 1). Repeat of similar type violation 338/84-37-03.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is not correct as stated since it is our interpretation that this is not a repeat of a similar type of violation.

2. REASON FOR THE VIOLATION:

The procedure review and approval process requires that the new or revised procedures be submitted in draft form for supervisory reviews and approval by the Station Nuclear Safety and Operating Committee (SNSOC). When approved, the procedure goes through a typing and proofreading process until issued in its final form. The editorial reviews conducted during the typing and proofreading process were not adequate. In addition, copy quality was not verified as adequate prior to issuing the copy of the procedures for use. However, the technical review of the procedures by station supervision and the SNSOC were adequate.

Therefore, the problems that have been identified are minor and administrative in nature and have not affected the performance of the procedures.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Administrative Procedure 5.4, "Processing New and Revised Procedures, Deletion of Procedures," was revised to better control the procedure development and review process. This revision was completed but not yet implemented (see Virginia Power letter dated March 21, 1985, Seri-

al No. 690A) when EMP-P-EP-8 and 8A were approved. Also the importance of procedures was emphasized to station supervision by memorandums from station management dated February 28, 1985 and March 20, 1985. The first memorandum provided managements expectation for high quality procedures and detailed guidelines for development of procedures. The second memorandum summarized the changes to ADM 5.4. These revisions to ADM 5.4 were reviewed and assessed with the inspectors at the time of the inspection and were found to be adequate. Additional revisions to improve ADM 5.4 have been initiated and are currently scheduled to be implemented in July, 1985.

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

We have reviewed the previous violation (50-338/84-37-03) and compared it to the events reported herein.

The violation in inspection report 84-37 (50-338/84-37-03) was not similar to the violation in this inspection report. The previous violation addressed errors in PT 94.5 and PT 94.7 that indicated inadequate technical review. Corrective actions for the root cause of this problem had been developed but were not yet completely implemented by the time EMP-P-EP-8 and 8A were developed and approved. Nevertheless, the technical review was thorough and adequate and the several administrative errors noted are not considered significant to the successful implementation of the procedures.

In order to preclude further administrative review problems, the following corrective actions will be taken:

1. An evaluation will be conducted to determine the need for additional procedure writers training which will address reviewing procedures for administrative accuracy. Training will be initiated as necessary based on the results of the evaluation. The evaluation will be completed by July 31, 1985.
2. EMP-P-EP-8 and 8A will be revised by September 1, 1985.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Corrective actions have been outlined in paragraph 4.

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM APRIL 8 TO APRIL 12, 1985
REPORT NOS. 50-338/85-11 AND 50-339/85-11

NRC COMMENT:

10 CFR 50.54(a)(1) requires Virginia Electric and Power Company (VEPCO) to implement their Quality Assurance Program described in its Safety Analysis Report. Section 17.2.5 of the VEPCO Quality Assurance Program requires that activities affecting quality be performed in accordance with instructions, procedures, or drawings.

Contrary to the above, completion steps on Mechanical Maintenance Procedure MMP-C-GV-1.2 were not initialed as required by Administrative Procedure 16.8, Use of Procedures During Maintenance.

This violation is applicable to Unit 1 only.

This is a Severity Level V Violation (Supplement 1).

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

2. REASON FOR THE VIOLATION:

This violation was due to personnel error resulting from improper attention to procedural compliance during performance of work utilizing Mechanical Maintenance Procedure MMP-C-GV-1.2. It should be noted that the intent of ADM 16.8 for supervisory acceptance was met. Each step in the procedure was initialed except for step 6.2 under Limits and Precautions and step 9.1 under acceptance. However, the signature blank under step 9.1 was fully executed and served to document that the acceptance criteria was met. Also, it should be noted that the completion of step 3.1 was not required to be performed by the person initialing the signoff step. The intent of the requirement was only that the Work Order be issued prior to proceeding.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

As a result, the station has and will continue to provide more supervision and training on the importance of following station procedures to maintenance support groups.

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

No further corrective actions are planned.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Corrective actions outlined in paragraph 3 above.