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JUL 23 1985

Virginia Electric and Power Company
ATTN: Mr. W. L. Stewart, Vice President,
Nuclear Operations
P. O. Box 26666
Richmond, VA 23261

Gentlemen:

SUBJECT: REPORT NOS. 50-338/85-11 AND 50-339/85-11

Thank you for your response of June 18, 1985, to our Notice of Violation issued on May 13, 1985, concerning activities conducted at your North Anna facility under NRC Operating License Nos. NPF-4 and NPF-7. We have evaluated your response and found that it meets the requirements of 10 CFR 2.201. With respect to Violation 1, we have carefully evaluated your response and have concluded, for the reasons presented in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation and appears to be a repeat of similar type violation 338/84-37-03. Normally, the licensee is required to submit an additional response in accordance with 10 CFR 2.201; however, your response to the violation and statements of corrective actions being taken to avoid future violations are acceptable and no further response is required. We will examine the implementation of your actions to correct these violations during future inspections.

We appreciate your cooperation in this matter.

Sincerely,

Original Signed By
Roger D. Walker

Roger D. Walker, Director
Division of Reactor Projects

Enclosure:
Staff Evaluation of Licensee Response

cc w/encl:
E. W. Harrell, Station Manager
R. J. Hardwick, Jr., Manager -
Nuclear Programs and Licensing

bcc w/encl: (See page 2)

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E. J. Butcher, NRR
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7/17/85

G. Jenkins

7/19/85

RII

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NMerriweather
7/17/85

RII

TC
TConlon
7/17/85

RII

AH
AHerd
7/17/85

RII

AG
AGibson
7/18/85

RII

VB
VBrownlee
7/19/85

ENCLOSURE

STAFF EVALUATION OF LICENSEE RESPONSE DATED JUNE 18, 1985

You make the following statements in your denial:

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

The reasons for the violation were that 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.

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.

Our assessment of your reasons for denial of the violation is as follows:

1. Our re-review of this violation and the previous violation (50-338/84-37-03) shows the same type of review problems, both administrative and technical. Some examples described in report 85-11 included poor quality sketches, sketches did not match the text, typographical errors, and misleading table specifying the number of retaining rings. These discrepancies appear to be in both technical and administrative areas.

Examples described in report 84-37 included typographical and technical errors in periodic test procedures used during Rod and Boron Worth Measurements. The following excerpts are taken from paragraph f.2 of report 84-37 concerning discrepancies in 1-PT-94.7.

In step 4.12, just critical is defined as $-3 \text{ pcm} < \Delta p < +123 \text{ pcm}$. The latter value should be $+3 \text{ pcm}$.

Step 4.19.1 has a relationship presented as $-10 \text{ pcm} \pm R_{CB} \pm 10 \text{ pcm}$ where $-10 \text{ pcm} < R_{CB} < 10 \text{ pcm}$ is intended.

Step 4.19.2 contains relations presented as $R_{CB} \text{ F-}10 \text{ pcm}$ and $R_{CB} \text{ J-}10 \text{ pcm}$. The F and J should be replaced by less than and greater than symbols respectively.

Some of the above discrepancies appear to be technical errors and some appear to be administrative typographical errors. Depending upon how critical the steps are in the procedure, the possibility of getting the plant into major difficulties exists whether the errors in the procedures are typographical or technical.

2. A further review of your responses to the violations described in reports 85-11 and 84-37 revealed that your "Reasons for the Violation" submitted for the violation in report 85-11 are very similar to your "Reasons for the Violation" submitted for the violation in report 84-37.
3. Your corrective actions initiated to correct and prevent future violations of the same type appear to be adequate and if implemented should reduce the number of errors in procedures and improve their administrative and technical adequacy.

In summary, we are satisfied with your response regarding your recognition of the root causes, the need for evaluation of training, and the initiation of corrective actions to improve your procedures; however, at the time of our inspection, the stated violation existed and constitutes the violation as stated in the Notice of Violation.