

## NOTICE OF VIOLATION

Virginia Electric and Power Company  
North Anna 1 and 2

Docket Nos.: 50-338, 50-339  
License Nos.: NPF-4, NPF-7  
EA 96-278

During an NRC inspection conducted on June 30 through August 10, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion V, and the licensee's Quality Assurance Program (Updated Final Safety Analysis Report, Chapter 17, Quality Assurance, Section 17.2.5, Instructions, Procedures and Drawings) collectively require that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures. Technical Specification 3.6.3.1 requires that one isolation valve be maintained operable in each containment penetration.

Contrary to the above, on August 2, 1994, an inadequate maintenance procedure was used to control maintenance activities affecting quality. Specifically, Maintenance Operating Procedure 1-MOP-51.03, Installation and Removal of N<sub>2</sub> or Air Rig for Residual Heat Removal (RHR) Hx CC Valve Actuators, revision 0-P1, was inadequate, in that, it was used to control maintenance activities which disabled all isolation valves in a Unit 1 containment penetration for approximately four hours. (01014)

This is a Severity Level IV Violation (Supplement I).

- B. 10 CFR 20.1904 (a) requires that each container of licensed material bear a durable, clearly visible label bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL," and the label must also provide sufficient information [such as the radionuclide(s) present, an estimate of the quantity of radioactivity, the date for which the activity is estimated, radiation levels, kinds of materials, and mass enrichment] to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures.

Contrary to the above, at approximately 1:45 p.m., on August 6, 1996, a full trailer container, designated as number 4A, with licensed material was found inside the protected area without the required label information. The label did not provide sufficient information (e.g., an estimate of the quantity of radioactivity, the date for which the activity is estimated, radiation levels, kinds of materials, and mass

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enrichment) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures.

This is a Severity Level IV violation (Supplement IV).

- C. Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented and maintained covering the activities referenced in the applicable procedures recommended in Appendix A of NRC Regulatory Guide 1.33, revision 2, dated February 1978. Paragraph 7.e of Appendix A to Regulatory Guide 1.33 states that the licensee should have written radiation protection procedures.

Virginia Power Administrative Procedure 2101, Radiation Protection Program, revision 10, dated June 25, 1996, section 6.7, Control of Radioactive Material, states, "Radioactive material controls shall be implemented to minimize the potential for uncontrolled spread of radioactivity to unrestricted areas where the public might be affected."

Contrary to the above, at approximately 4:55 a.m., on February 29, 1996, radioactive material controls were not implemented to minimize the potential for uncontrolled spread of radioactivity to unrestricted areas, in that, a contract employee with contaminated clothing above free release limits was permitted to exit the site from the West Security Portal.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your

response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia  
this 9 day of September, 1996