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VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

January 15, 1986

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

Serial No. 85-819A  
NAPS/JHL/vlh  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Dr. Grace: (

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT NOS. 50-338/85-27 AND 50-339/85-27

We have reviewed your letter of November 15, 1985, in reference to the inspection conducted at North Anna Power Station from October 7 to November 3, 1985, and reported in Inspection Report Nos. 50-338/85-27 and 50-339/85-27. Our response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact me.

Very truly yours,

*W. L. Stewart*

W. L. Stewart

Attachment

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PDR ADOCK 05000338  
Q PDR

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VIRGINIA ELECTRIC AND POWER COMPANY TO

Dr. J. Nelson Grace

cc: Mr. Roger D. Walker, Director  
Division of Reactor Projects  
NRC Region II

Mr. Lester S. Rubenstein, Director  
PWR Project Directorate # 2  
Division of PWR Licensing - A

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

Mr. Leon B. Engle  
NRC North Anna Project Manager  
PWR Project Directorate #2  
Division of PWR Licensing-A

RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED FROM OCTOBER 7 to NOVEMBER 3, 1985  
INSPECTION REPORT NOS. 50-338/85-27 and 50-339/85-27

NRC COMMENT:

10 CFR Part 50, Appendix "B", Criterion XVII requires, in part, that sufficient records be maintained that provide information regarding the qualifications of personnel performing the activities affecting quality.

Technical Specification 6.10.2.a requires records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report be retained for the duration of the facility operating license.

Amendment 4 of the Virginia Electric and Power Company (VEPCO) Topical Report, VEP-1, "Quality Assurance Program, Operations Phase", commits VEPCO to collect, store, and maintain quality assurance (QA) records in accordance with NRC Regulatory Guide 1.88, Revision 2, 1976, which endorses American National Standards Institute (ANSI) N45.2.9-1974.

Section 3.2 of ANSI N45.2.9-1974, provides instructions on what constitutes a valid QA record.

Contrary to the above, the record retention and qualification traceability requirements are not being satisfied. Specifically, the practice described in section 5.2.2.1 of Administrative Procedure (ADM) 3.1, dated August 15, 1985, which allows a person other than the one actually performing the action to sign for its completion, combined with the destruction of the white working copy of design change procedures, which do contain the signatures of the person who performed the action, does not ensure that a valid record of activities affecting quality is maintained. Design change procedures DCP-82-14B, DCP-83-24, and DCP-84-15 contain examples where a person other than the one who actually performed the activity affecting quality, signed for that action in the master colored controlled copy (i.e., record copy) of the procedure.

This is a Severity Level IV violation (Supplement I) and applies to both units.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEDGED VIOLATION:

The violation is correct as stated.

2. REASONS FOR THE VIOLATION:

Administrative Procedure (ADM) 3.1 requires that "steps completed shall be signed in the Master Colored Controlled Copy by the supervisor immediately responsible and knowledgeable of activities completed." ANSI N45.2.9 requires that records be "...signed, or otherwise authenticated and dated by authorized personnel." The requirement that the signatures be those of the person performing the action is not explicitly stated in ANSI N45.2.9.

The practice described in ADM 3.1, which allows a person other than the one performing the action to sign for its completion in the Master Colored Controlled Copy was considered to be consistent with the quality assurance requirements of Criteria 17 of Appendix B to 10CFR50 and the Quality Assurance Program, which commits to the requirements of Regulatory Guide 1.88, Revision 2, 1976, which endorses ANSI N45.2.9.

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

None.

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

ADM 3.1 will be revised to require the signer of steps in the Master Colored Controlled Copy to indicate, alongside his signature, the name of the signer of the same steps in the white working copy if different than the individual signing the Master Colored Controlled Copy.

In addition, a review of the sign-off process will be conducted and enhancements will be implemented as required.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

ADM 3.1 will be revised by April 1, 1986.

The review of the sign-off process will be completed and any necessary enhancements identified by October 31, 1986.