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VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

November 19, 1985

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

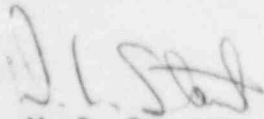
Serial No. 85-762  
NAPS/JHL  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Dr. Grace:

We have reviewed your letter of October 22, 1985, in reference to the inspection conducted at North Anna Power Station from September 16 to September 25, 1985, and reported in Inspection Report Nos. 50-338/85-25 and 50-339/85-25. Our response to the Notice of Violation is addressed in the attachment.

We have determined that no proprietary information is contained in the report. Accordingly, we have no objection to this inspection report being made a matter of public disclosure.

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

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RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED FROM SEPTEMBER 16, 1985 TO SEPTEMBER 25, 1985  
INSPECTION REPORT NOS. 50-338/85-25 AND 50-339/85-25

NRC COMMENT:

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

10 CFR 20.201(b) requires the licensee to perform such surveys as (1) are necessary to demonstrate compliance with 10 CFR 20.106 which limits the release of radioactivity to unrestricted areas and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, procedures to meet regulatory compliance for effluent analytical measurement capability were not adequate in that:

- a. Health Physics procedures pertaining to calibration and sample analyses by gamma spectroscopy system did not provide sufficient detail to maintain a consistent geometry between the calibration sources and the samples analyzed. Failure to maintain a constant geometry resulted in inaccurate gamma spectroscopy measurements.
- b. Procedure HP-3.3.9 "Minimum Detectable Activity" did not detail the correct formula for the determination of the analytical effluent measurement Lower Limits of Detection (LLD) as specified in Technical Specification Tables 4.11-1 and 4.11-2. As a result licensee LLD determinations were not properly computed.

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

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

2. REASONS FOR THE VIOLATION:

The procedure inadequacies resulted from personnel oversight during the review and revision of procedures for implementation of the Radiological Effluent Technical Specifications into the Appendix A Technical Specifications in January, 1984.

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

- a. When notified by the inspector of the Cs-137 disagreement using Detector No. 3, immediate action was taken to determine the cause. It was determined that the sample analysis geometry was different from the calibration geometry, resulting in a bias of the measurements for particulate filters.

Standard source preparation, instrument calibration, and operating procedures have been revised to delineate the necessity for standardization between calibration and analysis geometries.

- b. Procedure HP-3.3.9, which is used to meet regulatory compliance for radiological effluent measurements by containing the equation for determination of the Lower Limit of Detection (LLD), has been revised to be consistent with Technical Specification Tables 4.11-1 and 4.11-2.

Supervisory personnel responsible for the preparation, review and approval of Health Physics procedures have been reinstructed in the proper methods of procedure development and validation.

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

No further corrections are deemed necessary.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

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RICHMOND, VIRGINIA 23261

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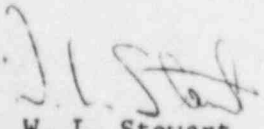
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10 CFR 20.201(b) requires the licensee to perform such surveys as (1) are necessary to demonstrate compliance with 10 CFR 20.106 which limits the release of radioactivity to unrestricted areas and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

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RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct as stated.

2. REASONS FOR THE VIOLATION:

The procedure inadequacies resulted from personnel oversight during the review and revision of procedures for implementation of the Radiological Effluent Technical Specifications into the Appendix A Technical Specifications in January, 1984.

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

- a. When notified by the inspector of the Cs-137 disagreement using Detector No. 3, immediate action was taken to determine the cause. It was determined that the sample analysis geometry was different from the calibration geometry, resulting in a bias of the measurements for particulate filters.

Standard source preparation, instrument calibration, and operating procedures have been revised to delineate the necessity for standardization between calibration and analysis geometries.

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