

June 30, 2000

Mr. David A Christian
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2, SURRY POWER STATION
UNITS 1 AND 2, REVIEW OF QUALITY ASSURANCE DESCRIPTION
SUBMITTAL IN ACCORDANCE WITH 10 CFR 50.54(a) REQUIREMENTS
(TAC NOS. MA8806, MA8807, MA8808, AND MA8809)

Dear Mr. Christian

We have reviewed your submittal dated April 5, 2000, which pursuant to the *Code of Federal Regulations* (10 CFR) Part 50.54(a), requested review and approval of proposed changes that reduce commitments to your quality assurance program description previously approved by the staff. Your response to the enclosed request for additional information (RAI) is required in order for the staff to complete this review.

Based on our need for the additional information, we do not regard the changes described in your proposed Revision to the North Anna and Surry Power Stations' Quality Assurance Program acceptable pursuant to 10 CFR 50.54(a)(4). Therefore, you should refrain from implementing these changes until you have been formally notified otherwise.

Our questions are provided in the Enclosure. The staff requests a response to the RAI within 60 days of the date of this letter. This response date was discussed with Mr. Tom Shaub of your staff on June 5, 2000, who indicated that Virginia Electric and Power Company will be able to meet this date. The staff appreciates the efforts expended with respect to this matter.

Sincerely,

/RA/

/RA/

Stephen R. Monarque, Project Manager,
Project Directorate II-1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Gordon E. Edison, Sr Project Manager
Project Directorate II-1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-280, 50-281, 50-338,
and 50-339

Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
NORTH ANNA AND SURRY POWER STATIONS
OPERATIONAL QUALITY ASSURANCE PROGRAM
REVISED RECORD RETENTION COMMITMENT

The following information is needed in order for the staff to complete its review of Virginia Electric and Power Company's (VEPCO) Quality Assurance Revised Record Retention Program. The responses to the questions below will provide an accurate definition of lifetime, as well as ascertain the record and training requirements for various employees.

1. Page 2 of the April 5, 2000, submittal from VEPCO contains a definition of the term "Lifetime." The definition provides four events defining the limits of "lifetime." Those limits are identified as:
 1. until termination of the Facility Operating License or
 2. until termination of employment or
 3. until transfer of ownership or
 4. service life of the facility, system, or component

Within the "Lifetime" definition, is the third option limited to the transfer of ownership of fuel or does that option also apply to the possible transfer of the facility operating license as a result of the transfer of ownership of the power plant?

2. In reviewing each of the items in section j), pages 6 through 9 and Table 17.2-2, of this submittal, it is unclear as to which of the "Lifetime" criteria is being applied when specifying the retention period. For example, on page 6 and in the table, VEPCO stated that radiological protection training records retention period is "Lifetime." However, the information goes on to indicate that records for terminated employees and contractors will be maintained until termination of the plant license.

When the table states "lifetime" as the retention period, the staff cannot determine if it is facility lifetime or employment lifetime. For each record type addressed by the proposed change, specifically identify which of the lifetime criteria apply.

3. VEPCO proposes that radiation protection (RP) training records retention applies to general radiation worker training and also to records for RP technician job specific training and retraining. The job specific training requirements for RP technicians is under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.120. Nine other categories of power plant workers are also covered by this regulation, but are not covered by this proposal.

On page 7, under the heading of Initial Training and Initial Qualification Records, VEPCO cites the employee records requirements contained in 10 CFR 73.26(d)(4). There is also some discussion with regard to appropriateness of use for records related to training of licensed operators. The requirements contained in 10 CFR 73.26(d)(4) would be inconsistent with the requirements contained in 10 CFR Parts 50 and 55 related to operator licenses.

Enclosure

10 CFR 73.26(d)(4) only applies to training of security personnel tasked with transportation and physical protection. Although security personnel are not covered under 10 CFR 50.120, VEPCO stated that the records retention standards of 10 CFR 73.26(d)(4), are appropriate for the categories of worker covered by 10 CFR 50.120, which included RP technician training records. Following the retention requirements contained in 10 CFR 73.26(d)(4) would conflict with the retention requirements proposed by VEPCO on page 6, and discussed above for records related to RP technician job specific training (See Comment 8).

What are the retention requirements for records related to the job specific training and qualification of RP technicians?

If there is a difference in the requirements for other categories of workers and RP technicians, what is the basis for making the records retention requirements for job specific training records for RP technicians different from that of other power plant workers?

4. On page 7, VEPCO discusses the requirements for training and records requirements contained in 10 CFR 73.26(d)(4) which calls for annual retraining with a records retention period of three years. The result is that the record would contain the current requalification information and documentation for two previous requalifications. VEPCO proposes that the same standard is appropriate for the programs in 10 CFR 50.120. However, these programs do not have any specified retraining times. Therefore, maintaining records within the programs covered by 10 CFR 50.120 using the 10 CFR 73.26(d)(4) criteria would not result in the same level of documentation. Additionally, a qualification within a training program covered by 10 CFR 50.120 could be valid indefinitely.

How does the proposed retention period accommodate qualification and requalification records that are valid for periods longer than 3 years?

5. Table 17.2-2 provides for a specific period of retention of training materials but excludes those associated with RP training and licensed operator training.

What is the retention period for training materials for RP training and licensed operator training?

Why are more recent records not being retained while records about lesson materials that may date back to initial construction of the plant being maintained?

6. Page 8 contains a discussion related to retraining, specialized training and continuing training and again excludes those related to job specific training for RP technicians. VEPCO references 10 CFR 26.21(b) and 10 CFR 26.22(c) and 10 CFR 34.43(d) (VEPCO incorrectly cited 34.31(c)) as justification for reducing the retention period from "lifetime" to 3 years. However, each of the sections cited has annual retraining requirements that would result in a level of documentation like that discussed in question 4. Since 10 CFR 50.120 does not require a specific frequency for retraining or continuing training, applying the 3 year retention standard to programs covered by 50.120 would result in a different level of documentation than that which results from 10 CFR 26.21(b) and 10 CFR 26.22(c) and 10 CFR 34.43(d).

Is the expected level of documentation for the training programs covered in 10 CFR 50.120 intended to be the same? If not, then what is the justification for having fewer records for those programs?

7. The words 'subsequent' and superseded are both used. However, since they are not synonymous terms, provide the distinction between the two as used in this submittal.
8. Page 14, Security Plans and Implementing Procedures Audits, VEPCO is requested to provide the specific paragraph and section for Part 73 and Part 26, which contain the record retention requirements for audits of the security plan and implementing procedures. Comments may be included in the respective plans but must comply with the requirements contained in Parts 26/73 and specifically 10 CFR 73.70.
9. Page 14, Emergency Plan and Procedures Audits, VEPCO is requested to provide the specific paragraph and section for Part 50, which contain the record retention requirements for audits of the emergency plan and implementing procedures.

Mr. David A. Christian
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Units 1 and 2

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