

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 8, 2000

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

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Docket Nos. 50-280/281
50-338/339
License Nos. DPR-32/37
NPF-4/7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
OPERATIONAL QUALITY ASSURANCE PROGRAM
REVISED RECORD RETENTION COMMITMENT
REQUEST FOR ADDITIONAL INFORMATION

In an April 5, 2000 letter (Serial No. 00-037), Virginia Electric and Power Company (Virginia Power) submitted a revision to the Operating Quality Assurance Program for NRC review and approval. The proposed program changes reduce the current commitment for record retention requirements. In a June 30, 2000 letter the NRC requested additional information to complete the review of the proposed record retention requirements. The attachments to this letter provide the additional information requested and the revised QA Topical Report pages.

If you have any questions or require additional information, please contact us.

Very truly yours,



William R. Matthews
Vice President - Nuclear Operations

Attachments

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cc: U. S. Nuclear Regulatory Commission
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**REQUEST FOR ADDITIONAL INFORMATION
NORTH ANNA AND SURRY POWER STATIONS
OPERATIONAL QUALITY ASSURANCE PROGRAM**

Virginia Electric and Power Company

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.

NRC Question 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 (FOL) 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?

Response 1:

In the footnote further defining lifetime, "transfer of ownership" was limited to transfer of fuel. This was referring to that time when ownership of the spent fuel was transferred to the Department of Energy. If the facility ownership is transferred, that would not affect the record retention requirements. The new owner/operator would still be required to retain sufficient records to provide documented evidence of the quality of the activities affecting safety. Therefore, "transfer of ownership" remains only associated with the nuclear fuel.

NRC Question 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.

Response 2:

The records retention table in the QA Topical Report has been annotated to indicate the specific definition of "lifetime" that applies for specific records applications to eliminate any confusion with the required retention period. With a few exceptions, "lifetime" for the plant staff training record retention requirement is until termination of employment. "Lifetime" for radiation protection training records is until termination of facility operating license.

NRC Question 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.

Response 1st paragraph

Item j) and the line item in Table 17.2-2 "Records Of Current Individual Plant Staff Members Qualifications, Experience, Training And Retraining Records," is intended to cover all plant staff members addressed in 10 CFR 50.120, and identifies the record retention period as "lifetime" or as noted below. The record retention for the plant staff, other than radiation protection training records, is lifetime (termination of facility operating license) for any initial qualification records and three cycles for any requalification training records

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.

Response 2nd paragraph

10 CFR 73.26(d)(4) requires record retention of initial qualification for the term of employment and each requalification for three years from the date of qualification. Our use of this Part 73 requirement was only intended as a reasonable reference and regulatory precedent for establishing training record retention requirements for those individuals/disciplines that were not established in the regulation (e.g., 10 CFR 50.120). Our proposal to retain initial qualification records for worker lifetime (i.e., until termination of employment) and requalification/retraining records for three cycles does not extend to or subsume the record retention requirements for radiation protection workers or licensed operators. Specifically, radiation protection training records will be maintained until termination of the facility operating license based on other business

considerations and operator training records for six years consistent with the license renewal cycle. The proposal referencing Part 73 criteria applies to training record retention requirements not otherwise specified elsewhere in the regulations. The discussion in the original submittal was to document a previous telephone conference call with the NRC staff on training record retention. At that time, the NRC staff agreed that our proposed six-year retention requirement for licensed operator training requalification records was consistent with the intent of 10 CFR 73.26(d)(4) for training record retention.

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).

Response 3rd paragraph

As stated above, we had only intended to use 10 CFR 73.26(d)(4) as a reasonable reference and regulatory precedent to establish a basis for plant staff record retention requirements that are not otherwise prescribed elsewhere in regulation. Radiation protection training records and licensed operator requalification records retention requirements have been addressed individually.

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

Response 4th paragraph

The record retention for all radiation protection training, either radiation protection technician training or radiation worker training, is maintained lifetime (termination of facility operating license).

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?

5th paragraph

Independent of regulation, records associated with radiation protection (e.g., surveys, contaminated areas, training records etc.) may be maintained beyond the termination of the facility operating license for business liability considerations. Thus, these record types are identified as "lifetime" (until termination of facility operating license) in the QA Topical Report. This record retention requirement is a purposeful overcommitment for consistency with business purposes outside of NRC regulation.

NRC Question 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.

Response 1st paragraph

Other than the licensed operators' requalification program which is based on a six year cycle, continuing training for the plant staff is provided on an annual cycle basis (e.g., 50.59 requalification, confined space retraining, respiratory retraining, technical training, etc.). Therefore, implementing a record retention requirement for the plant staff similar to 10 CFR 73.26(d)(4) is not inconsistent with qualification periods or required levels of documentation. Any plant staff initial qualification record or specific training that establishes qualification would be maintained as a lifetime record (i.e., termination of employment, except for the case of radiation protection qualification records which will be termination of facility operating license)

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

Response 2nd paragraph

Initial qualification records do not fall into this three-year retention category, but rather are maintained for "lifetime" of plant personnel (i.e., termination of employment). The only exemption to this is radiation protection qualification records that are actually maintained beyond the termination of the facility operating license as addressed above.

To address the NRC concern over different requalification cycle lengths, we will modify and specify the retention requirement from three years to three requalification cycles.

NRC Question 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?

Response 1st and 2nd paragraphs

Table 17.2-2 will be modified to include record retention requirements for the training materials associated with radiation protection and licensed operator training programs. The present exceptions in the description column will be removed as exclusions and included as specific line items under "Training Materials."

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?

Response 3rd paragraph

The retention requirements for maintaining the initial training materials for "lifetime" (termination of facility operating license) and superceded training material for 3 training cycles for plant staff (except for radiation protection training records and for licensed operators) is simply based on utilizing 10 CFR 73.26(d)(4) as a record retention reference and regulatory precedent.

NRC Question 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).

Response 1st paragraph

Please refer to our clarification in Question 4. We are revising the retention requirement to be 3 (requalification) cycles for the remainder of the plant staff. Licensed operator requalification training records will remain 6 years after the license renewal and radiation protection training records will be maintained as "lifetime" (termination of facility operating license).

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?

Response 2nd paragraph

The records retention requirement for the training programs covered in 10 CFR 50.120 is the same with the exception of radiation protection. Records associated with radiation protection (e.g., surveys, contaminated areas, training records etc.) are maintained until the termination of the facility operating license as a purposeful overcommitment due to business liability considerations outside the scope of NRC regulation. Thus, radiation protection initial program documents and revisions are maintained for facility lifetime (termination of facility operating license). The other training programs initial program documents are maintained lifetime (termination of facility operating license) and the requalification program documents are maintained for 3 training cycles.

NRC Question 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.

Virginia Power will modify the QA Topical Report change to use the word "superceded" in each case to describe the training materials retention period.

NRC Question 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.

Response

10 CFR 73.55(g)(4)(ii) requires a security plan review that includes an audit of security procedures and practices. The record of this audit is required to be maintained three years. 10 CFR 50.54(p)(4) requires review of the safeguard contingency procedures and practices. The record of this audit is required to be maintained three years. 10 CFR 73, Appendix C, Audits and Reviews, requires a review and audit and subparagraph (3) requires the record of this audit be maintained three years.

10 CFR 73.70, Records, specifically establishes the three year period as the retention requirement for the security records identified in this section.

10 CFR Part 26.80, Audits, applies to the fitness for duty program and does not deal with security. This reference is not applicable to the proposed changes.

NRC Question 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.

Response

10 CFR 50.54(t) establishes the requirement for independent review and records retention.

Additional question received on telephone conference call with NRC June 13, 2000

Redefinition of lifetime record retention period and replacement of the current life of plant appears to be inconsistent with 10 CFR 20 paragraphs 20.2103(b), 20.2105(b), 20.2106(b), and 20.2107(b). In particular, the "until termination of employment" and "service life of system" parts of the proposed definition for radiation exposure records and radioactive gaseous releases would not ensure that the above Part 20 paragraphs requirements for record retention (that require certain records to be retained until the Commission terminates each pertinent license requiring the record) would be met.

Response

The Operational Quality Assurance Program was written to cover the operating phase on the license including any life extension. We would expect that a "possession only" license would be required after the termination of the Facility Operating License. This would correspondingly require a modification of the Quality Assurance Program. Record requirements necessary throughout the "possession only" phase of the license would be specified and agreed to by the NRC as part of the license conversion at that time. Those record retention requirements would address the records required by 10 CFR 20, including the paragraphs identified in the NRC question. In addition, we have modified the record retention table to identify the appropriate definition of "lifetime."

Proposed Quality Assurance Program Changes

Virginia Electric and Power Company

LIST OF FIGURES (APPENDIX A)

Figure	Title	Page
17.2.1-1	Offsite Nuclear Organization	17.2-37
17.2.1-2	Onsite Nuclear Organization	17.2-38
17.2.1-3	Onsite Reporting to Offsite Nuclear Organization	17.2-39

LIST OF TABLES (APPENDIX B)

Table	Title	Page
17.2-0	Conformance of the Company’s Operational Quality Assurance Program to NRC Regulatory Guides and ANSI Standards	17.2-43
17.2-1	Relationship of the Company’s Operational Quality Assurance Program to Appendix B, 10 CFR 50	17.2-99
17.2-2	Station Records Retention Requirements	17.2-101
17.2-3	[Deleted]	17.2-104

Table 17.2-0 (continued)
STANDARD, REQUIREMENT OR GUIDE

Regulatory Guide 1.88 (continued) — *Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records - (Rev. 2, 10/76) - Endorses ANSI N45.2.9-1974*

The Company's Position	Conformance Status	Justification
(12) With regard to Section A.6 of Appendix A to ANSI N45.2.9-1974 entitled, <i>Operation Phase Activity Records</i> , Section A.6.1, "Operation, Maintenance & Testing," is replaced by the information in Table 17.2-2.		
(13) With regard to Section 1.4 of ANSI N45.2.9-1974 entitled, <i>Definitions</i> . The definition of "Quality Assurance Records" is revised to the following: "Those records which furnish documentary evidence of the quality of item and activities affecting quality or compliance with the NRC regulations. Documents are considered to be quality records when the document has been completed, including all required signatures, reviews, and approvals. At the expiration of a QA record period, the document is declassified and may be disposed of, if appropriate, as determined by Company management."		
(14) Consistent with ANSI N45.2.9, Section 2.2, the definition of lifetime for record retention is footnoted as follows: <ul style="list-style-type: none"> a. Lifetime is (1) until the termination of the Facility Operating License, (2) until termination of employment (training and qualification records); (3) transfer of ownership (i.e., fuel); or (4) service life of the facility, system, or component, as applicable. 		

Table 17.2-2 RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
Records and drawing changes reflecting plant design modifications made to system and equipment described in the final safety analysis report	Lifetime ^{a (1)}
Records of new and spent fuel inventory, transfers of fuel, and assemblies histories	Lifetime ^{a (3)}
Records of plant radiation and contamination surveys	Lifetime ^{a (1)}
Records of off-site environmental monitoring surveys	Lifetime ^{a (1)}
Records of radiation exposure of all plant personnel, and others who enter radiation control areas	Lifetime ^{a (1)}
Records of radioactive levels of liquid and gaseous waste released to the environment	Lifetime ^{a (1)}
Records of transient or operational cycles for those plant components that have been designated to operate safely for a limited number of transients or operational cycles	Lifetime ^{a (4)}
Records of inservice inspections	Lifetime ^{a (4)}
Records of meetings of the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee	Lifetime ^{a (1)}
Records of the service lives of all hydraulic and mechanical snubbers on safety-related systems, including the date at which the service life commences and associated installation and maintenance records	Lifetime ^{a (4)}
Records of secondary water sampling and water quality	Lifetime ^{a (1)}
Records of Environmental Qualification in accordance with 10 CFR 50.49	Lifetime ^{a (1)}
Records of reviews performed for changes made to the offsite dose calculation manual and the process control program	Lifetime ^{a (1)}
Records of normal plant operation, including power levels and periods of operation at each power level	5 years
Records of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment related to nuclear safety	5 years
Reportable events reports	5 years
Records of periodic checks, inspections, and calibrations performed to verify that surveillance requirements are being met	5 years
Records of special reactor tests or experiments	5 years

Table 17.2-2 (continued) RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
Records of changes made in procedures pursuant to 10 CFR 50.59	5 years
Records of Audits Performed to 10 CFR 50, Appendix B, Quality Assurance Program	5 years
Records of radioactive material shipments	5 years
Records of sealed source leak test results and physical inventories of sealed sources material	5 years
Records of current individual plant staff members qualifications, experience, training and retraining	Lifetime or as noted below
<ul style="list-style-type: none"> • Radiological protection training records (e.g., Nuclear Employee Training, Advanced Radiation Worker, Radiation Protection Technician, etc.) 	Lifetime ^{a (1)}
<ul style="list-style-type: none"> • Initial training and qualification records 	Lifetime ^{a (2)}
<ul style="list-style-type: none"> • Requalification records (excepted licensed individuals) 	3 cycles
<ul style="list-style-type: none"> • Requalification records for licensed individuals 	6 years after license renewal
<ul style="list-style-type: none"> • Training materials - Revision 0 records 	Lifetime ^{a (1)}
-- Plant Staff training materials - Superseded Revisions	3 cycles
-- Licensed Operators training materials - Superseded Revisions	6 years
-- Radiation Protection training materials - Superseded Revisions	Lifetime ^{a (1)}
<ul style="list-style-type: none"> • Retraining, specialized training, continuing training records (except licensed individual and Radiological Protection technicians) 	3 cycles
<ul style="list-style-type: none"> • Contractor training (except Nuclear Employee Training, Advanced Radiation Worker, Radiation Protection Technician training and retraining etc.) 	3 cycles
<ul style="list-style-type: none"> • INPO Accreditation records 	Initial accreditations - Lifetime ^{a (1)} and superseded material - 4 years

Table 17.2-2 (continued) RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
<ul style="list-style-type: none"> • Simulator facility records (e.g., certification and basis documents, NRC Form-474, performance test, fidelity reports, maintenance and modifications, and basis documents, etc.) 	Initial accreditation records - Lifetime ^{a (1)} and superceded material - 4 years after submittal of NRC Form-474

- a. Lifetime - is (1) until the termination of the Facility Operating License, (2) until termination of employment (training and qualification records); (3) transfer of ownership (i.e., fuel); or (4) service life of the facility, system, or component, as applicable.

Table 17.2-3 [DELETED]