

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

August 6, 2002

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Serial No. 02-457
NL&OS/SLW R0
Docket Nos. 50-280, 281
50-338, 339
License Nos. DPR-32, 37
NPF-4, 7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY AND NORTH ANNA POWER STATIONS UNITS 1 AND 2
OPERATIONAL QUALITY ASSURANCE PROGRAM
NUCLEAR OVERSIGHT BOARD (NOB) DELETION

In accordance with 10 CFR 50.54(a)(4), Virginia Electric and Power Company (Dominion) is submitting a revision to the Operational Quality Assurance Program (Topical Report) for your review and approval. The current Topical Report describes two review boards that report to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer: Management Safety Review Committee (MSRC) and Nuclear Oversight Board (NOB). The proposed change deletes the description of and the reference to the NOB.

The MSRC performs all of the required independent review requirements to meet Appendix B and ANSI N18.7 - 1976. Although the NOB performs no Appendix B function, it is also listed as a review board in the Topical Report and, therefore, we are submitting its removal as a change in commitment. A discussion of the proposed Operational Quality Assurance program change is provided in Attachment 1. The proposed change is provided as a mark-up in Attachment 2 and a typed version in Attachment 3.

Please contact us if you have any questions or require additional information.

Very truly yours,



Eugene S. Grecheck
Vice President - Nuclear Support Services

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Commitments made in this letter:

1. There are no commitments made in this letter.

Attachments:

1. Discussion of Change
2. Mark-Up of Topical Report
3. Proposed Topical Report

**cc: US Nuclear Regulatory Commission
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NRC Senior Resident Inspector
Surry Power Station**

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NRC Senior Resident Inspector
North Anna Power Station**

**Commissioner
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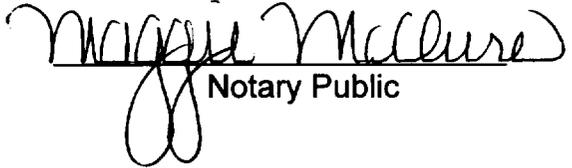
SN: 02-457
Docket Nos.: 50-280/281
50-338/339
Subject: Operational QA Program
Nuclear Oversight Board Deletion

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President - Nuclear Support Services, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 6th day of August, 2002.

My Commission Expires: March 31, 2004.


Notary Public

(SEAL)

Attachment 1

Discussion of Change

**Dominion
Surry and North Anna Power Stations
Units 1 and 2**

DISCUSSION OF CHANGE

1.0 Introduction

Pursuant to 10 CFR 50.54(a)(4), Virginia Electric and Power Company (Dominion) requests review and approval of the removal of the Nuclear Oversight Board (NOB) from the Operational Quality Assurance Program (Topical Report) for the North Anna and Surry Power Stations. Although the NOB does not perform a 10 CFR 50 Appendix B quality assurance function, it is identified in the Topical Report as an independent review board to assist the Senior Vice President – Nuclear Operations and Chief Nuclear Officer in the oversight of nuclear activities. Because the NOB is listed as an independent review board in the QA Topical Report, we are submitting this change as a reduction in commitment.

2.0 Discussion of Change

The QA Topical Report is being revised to delete the description of and reference to the Nuclear Oversight Board (NOB) from the UFSAR Section 17.2.1, Organization. Specifically, Subsection 17.2.1.2.A.2, Nuclear Oversight Board (NOB) and reference to the NOB in Figure 17.2.1-1, Offsite Nuclear Organization, is being deleted.

3.0 Background

Quality Assurance Program Topical Report Subsection 17.2.1.2, Nuclear Management, describes in Section A the function of the Senior Vice President - Nuclear Operations and Chief Nuclear Officer and the two review boards that report to this position: Management Safety Review Committee (MSRC) and Nuclear Oversight Board (NOB). The offsite safety review function required to meet Appendix B is performed by the MSRC and is described in Surry Technical Specifications and Appendix C to the Topical Report. The NOB performs an independent review and oversight of nuclear activities at the senior management level as an advisory capacity to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer. The NOB reviews nuclear management practices, policy issues, regulatory and performance trends and organizational factors relating to nuclear activities, and provides program oversight through management reports, document reviews, group discussions, and individual experience. The NOB function is not safety related nor does it provide any Appendix B quality review function. The NOB was only added to the Topical Report for completeness in 1993 when the entire Section 17.2.1, Organization, was revised. That change was noted as administrative in nature and was intended to update and clarify the description of the nuclear organization as well as to enhance readability. Removal of the description of the NOB from the organizational description in UFSAR Chapter 17 does not change the function or reporting of any person or organization performing a quality assurance function.

4.0 Applicable Regulatory Requirements/Criteria

Consistent with 10 CFR 50 Appendix B requirements, the nuclear organization and associated position responsibilities are delineated in the Quality Assurance Topical Report (UFSAR Section 17.2.1 "Organization"). Section 17.2.1.2 describes two review boards that report to the Senior Vice President – Nuclear Operations and Chief Nuclear Officer. The two boards are the Management Safety and Review Committee (MSRC) and the Nuclear Oversight Board (NOB). Table 17.2-0, "Conformance of the Company's Operational Quality Assurance Program to NRC Regulatory Guides and ANSI Standards", lists under the commitment to Regulatory Guide 1.33 *Quality Assurance Requirements (Operation)* (Rev. 2, 2/78) - Endorses ANSI N18.7- 1976, item (9) as follows;

(9) With regard to Section 4. 3 of ANSI N18.7- 1976, titled **Independent Review Process**: The requirements of this Section, including all of its subparts, shall be met by compliance with the Technical Specification requirements for Surry Power Station and Appendix C of this topical report for North Anna Power Station.

Appendix C of the Topical Report and Surry Technical Specifications (TS) Section 6.0, Administrative Controls, delineate the responsibilities of the MSRC as the independent review function required by the standard. The NOB is not mentioned in Surry TS or Appendix C of the Topical Report and is not required to perform a quality or safety function. The description of the NOB in the Topical Report was added for completeness as a general description of the nuclear organization and function. The NOB is not relied on to perform an Appendix B function and is therefore being removed from the Topical Report.

5.0 References

- 5.1 QA Topical Report, UFSAR Chapter 17. Section 17.2.1 "Organization", Table 17.2-0, "Conformance of the Company's Operational Quality Assurance Program to NRC Regulatory Guides and ANSI Standards" and Appendix C.
- 5.2 10 CFR 50 Appendix B
- 5.3 Surry Technical Specifications Section 6.0
- 5.4 Regulatory Guide 1.33, "Quality Assurance Requirements (Operation)", (Rev. 2, 2/78)
- 5.5 Standard ANSI N18.7- 1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"

Attachment 2

Mark-up of Topical Report

**Dominion
Surry and North Anna Power Stations
Units 1 and 2**

1. Management Safety Review Committee (MSRC)

The MSRC is the body which performs the offsite safety review function. It reports to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer and provides an independent review in the areas of station operations, maintenance, reactivity management, engineering, chemistry & radiochemistry, radiological safety, quality assurance practices, and emergency preparedness. The Technical Specifications of each station further define the function, composition, alternates, consultants, meeting frequency, quorum, reviews, audits, authority and records of this committee.

One of the functions of the MSRC is to oversee the Safety Evaluation Program to ensure that it is effective in identifying unreviewed safety questions. The MSRC accomplishes this function by reviewing a sample of approved safety evaluations to ensure that unreviewed safety questions are being properly identified and by conducting periodic assessments of the Safety Evaluation Program (References 4 and 5).

The review of a sample of safety evaluations uses a graded and safety significant approach to select safety evaluations for review. All safety evaluations are screened upon receipt, and the following criteria are used to select a sample for MSRC review:

- Safety evaluations for certain types of activities will receive a 100% review by the MSRC. These include, for example, safety evaluations for Technical Specification changes, justifications for continued operation and special tests.
- All safety evaluations for changes that have a high potential for impacting nuclear safety or regulatory requirements will be reviewed by the MSRC.
- A representative sample of safety evaluations will be reviewed from the remaining safety evaluations prepared. These safety evaluations will be selected to ensure a representative sample of safety evaluations of each type of activity has been reviewed in an amount consistent with program objectives. Provisions are also in place to adjust the sample sizes of the safety evaluations based on MSRC and assessment findings.

~~2. Nuclear Oversight Board (NOB)~~

~~The NOB functions to provide independent review and oversight of nuclear activities at the senior management level and in an advisory capacity to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer. The NOB reviews nuclear management practices, policy issues, regulatory and performance trends~~

~~and organizational factors relating to nuclear activities, and provides program oversight through management reports, document reviews, group discussions, and individual experience. Membership consists of senior nuclear utility executives and other members appointed on the basis of industry knowledge and/or expertise.~~

B. Vice President Nuclear Operations

The Vice President Nuclear Operations is the Corporate individual responsible to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer for the operation of the Nuclear Stations and ISFSIs. He has overall responsibility for implementing the quality assurance program for the operational phase of the Nuclear Stations and ISFSIs.

1. Site Vice President

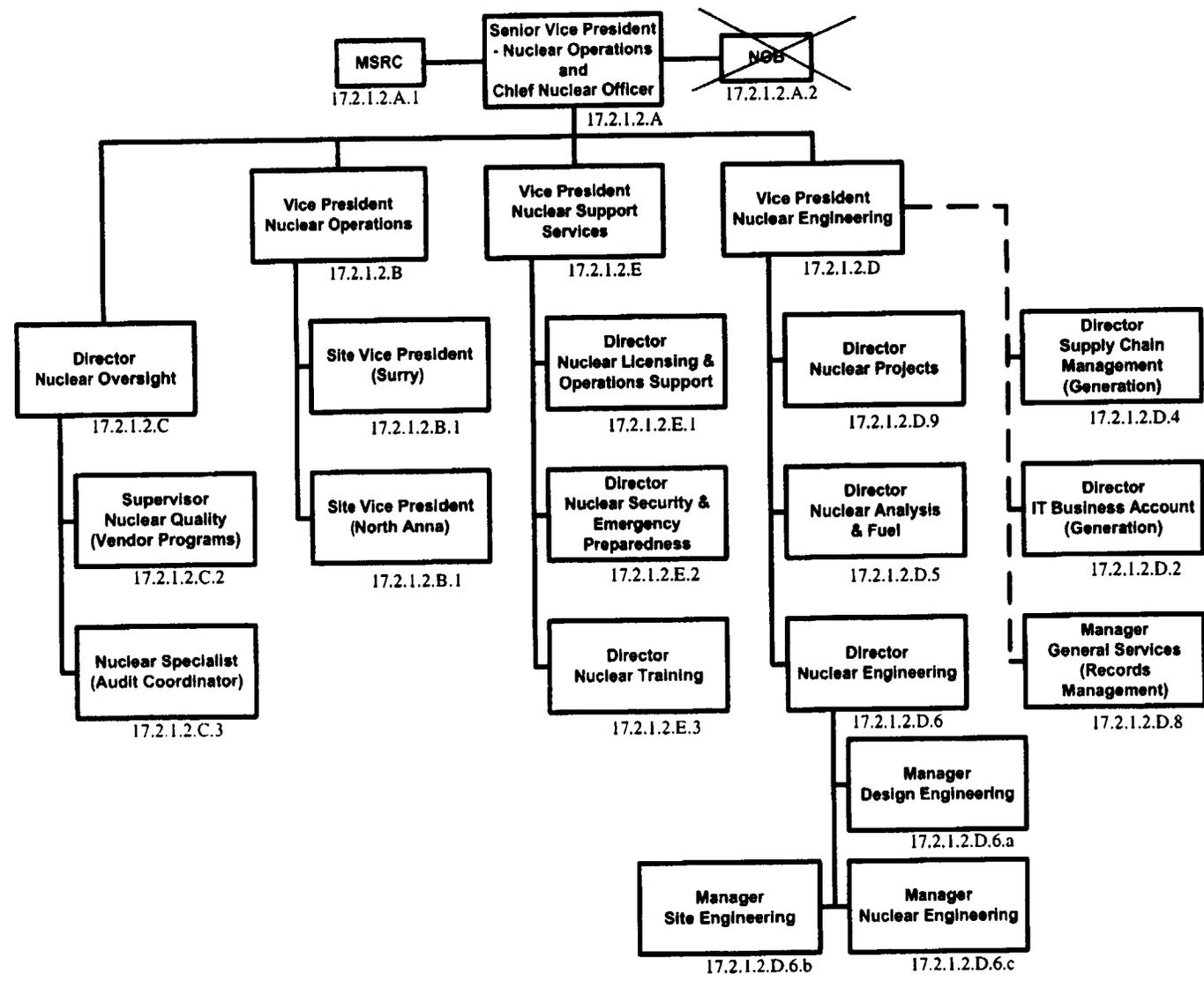
Responsible to the Vice President Nuclear Operations for the overall safe and efficient operation of the station and ISFSI, and for the implementation of quality assurance requirements in the areas specified by the operational quality assurance program. The Site Vice President has supervisory control over all Virginia Electric and Power Company personnel within the station organization and administrative control over all other Company and non-Company individuals within the nuclear site's boundary. The Site Vice President is the local representative of Company management and is empowered to implement all Company policy with regard to operations of the facility, support of Company public relations policy, and employee relations policies. The Site Vice President is also responsible for coordinating station functions with offsite (Company and non-Company) agencies and services, and ensuring station personnel are adequately trained in accordance with the Emergency Plan. The Site Vice President fulfills the position of Plant Manager identified in the ISFSI Technical Specifications.

In the absence of the Site Vice President, these duties will be assumed by the Director Station O&M (Operations and Maintenance) unless otherwise designated in writing.

a. Station Nuclear Safety and Operating Committee

Serves in an advisory capacity to the Site Vice President. The technical specifications of each station define the responsibilities of this committee. The Station Nuclear Safety and Operating Committee is separate from operational quality assurance activities in that its authority and responsibilities are not established by the Operational Quality Assurance Program. However, since the prime responsibility of this committee is to provide a continuing review of the operational and safety aspects of the station, it does perform a quality assurance function.

Figure 17.2.1-1
 OFFSITE NUCLEAR ORGANIZATION



Attachment 3
Proposed Topical Report

Dominion
Surry and North Anna Power Stations
Units 1 and 2

One of the functions of the MSRC is to oversee the Safety Evaluation Program to ensure that it is effective in identifying unreviewed safety questions. The MSRC accomplishes this function by reviewing a sample of approved safety evaluations to ensure that unreviewed safety questions are being properly identified and by conducting periodic assessments of the Safety Evaluation Program (Reference 5).

The review of a sample of safety evaluations uses a graded and safety significant approach to select safety evaluations for review. All safety evaluations are screened upon receipt, and the following criteria are used to select a sample for MSRC review:

- Safety evaluations for certain types of activities will receive a 100% review by the MSRC. These include, for example, safety evaluations for Technical Specification changes, justifications for continued operation and special tests.
- All safety evaluations for changes that have a high potential for impacting nuclear safety or regulatory requirements will be reviewed by the MSRC.
- A representative sample of safety evaluations will be reviewed from the remaining safety evaluations prepared. These safety evaluations will be selected to ensure a representative sample of safety evaluations of each type of activity has been reviewed in an amount consistent with program objectives. Provisions are also in place to adjust the sample sizes of the safety evaluations based on MSRC and assessment findings.

2. [Deleted]

B. Vice President Nuclear Operations

The Vice President Nuclear Operations is the Corporate individual responsible to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer for the operation of the Nuclear Stations and ISFSIs. He has overall responsibility for implementing the quality assurance program for the operational phase of the Nuclear Stations and ISFSIs.

1. Site Vice President

Responsible to the Vice President Nuclear Operations for the overall safe and efficient operation of the station and ISFSI, and for the implementation of quality assurance requirements in the areas specified by the operational quality assurance program. The Site Vice President has supervisory control over all Virginia Electric and Power Company personnel within the station organization and administrative control over all other Company and non-Company individuals within the nuclear site's boundary. The Site Vice President is the local representative of Company management and is empowered to implement all Company policy with regard to

Figure 17.2.1-1
OFFSITE NUCLEAR ORGANIZATION

