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June 21, 1985



VIRGINIA POWER

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

Serial No. 85-369  
NO/ETS:acm  
Docket Nos. 50-280  
50-281  
50-338  
50-339  
License Nos. DPR-32  
DPR-37  
NPF-4  
NPF-7

Dear Dr. Grace:

VIRGINIA POWER  
SURRY POWER STATION  
NORTH ANNA POWER STATION  
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

We have reviewed your letter of May 10, 1985, in reference to the SALP evaluations reported in IE Report Nos. 50-338/85-04, 50-339/85-04, 50-280/85-05 and 50-281/85-05. Our response to the SALP evaluations for the Surry and North Anna Power stations is attached.

Additionally, you requested that we address corrective actions for the Surry surveillance program. As described in the attachment to this letter, we believe that a major factor in several of the violations identified in the surveillance program was the processing and initial implementation of Technical Specification changes. An additional factor in other violations cited in the SALP was the level of administrative control for review of licensing correspondence and licensing related station activities in early 1984.

In June, 1984, an organizational change was made to strengthen the licensing review process. Revision to the Surry administrative procedures and controls for handling and implementing Technical Specification changes will be revised by June 30, 1985.

To enhance our management overview of station performance Virginia Power has developed a pilot violation tracking system that parallels your SALP evaluation process. For the last evaluation period (9/1/83 - 2/28/85) the results of our evaluation were slightly different than yours (e.g., number of violations and functional categorization of these violations). To better coordinate and utilize our tracking system we are requesting that you consider providing the inspection report number for the violations identified in each functional area, for all future SALP reports.

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**VIRGINIA POWER**

Based on the information in the attachments we are requesting that you reconsider the Category III rating in the Surveillance area for Surry and the Category II ratings in the Emergency Preparedness area for both stations.

Should you have any questions concerning these matters we would be happy to discuss them with you.

Very truly yours,

f W. L. Stewart

Attachments

1. SPS Surveillance
2. SPS and NAPS Emergency Preparedness

cc: (w/attachments)

Mr. D. S. Burke  
NRC Resident Inspector  
Surry Power Station

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

Mr. S. A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

Mr. E. J. Butcher, Acting Chief  
Operating Reactors Branch No. 3  
Division of Licensing

## SURRY POWER STATION

Functional Area: Surveillance

Rating: Category III

Based on our review of the SALP and the information provided below we request that you reconsider the Category III Rating for the functional area - Surveillance.

We believe that some of the violations cited as the basis for the Category III rating were inappropriately classified as only surveillance deficiencies and should be shared with the licensing area. In examining the root cause(s) of several of the violations, we have determined that licensing controls for handling Technical Specification changes and their initial implementation played a significant role leading to the violations. Some examples are the violations identified in IE Inspection Reports 84-03, 84-15 and 85-01. We have previously identified the need to improve the process and controls for handling and implementing Technical Specification changes. Specifically, in our response to IEIR 85-01 (re: Virginia Power letter, Serial Number 85-168, dated April 1, 1985) we committed to revising station administrative procedures which control the processing and implementing Technical Specification changes by June 30, 1985. In addition, the failure to perform the surveillance on the control room chlorine detectors (cited in IEIR 85-01) was licensee identified. As a result, we initiated investigations to verify implementation of other surveillance requirements and identified the concerns about our Technical Specification change process. In addition, operations periodic test records and entries in operator logs provided assurance that the detectors were operable during this missed surveillance interval.

Several violations cited in the SALP were related to our In-Service Inspection Programs (ISI). One violation (IEIR 84-05) identified by Virginia Power, resulted from the late submittal of a test report. The late submittal was attributable to an ANI inspector's concern on an inspection procedure. The test results and test method were acceptable; therefore, the finding was administrative in nature and involved no safety significance. The snubber service life program violations (IEIR 84-03 and 84-11) were handled promptly. Additional inspections were conducted and safety analyses based on inspection results determined that no safety problems existed and the safety significance of the findings was minimal.

The violation resulting in the civil penalty assessed for inoperable Reactor Vessel Head Vents (IEIR 84-10) was due to personnel error, not to the surveillance program. The information used to support the system status was outdated and not properly verified prior to submittal. Also, the rule change that required operability of the Reactor Vessel Head Vent system was not properly reviewed. This situation was further complicated by lack of procedures for governing operation of Reactor Vessel Head Vents, which were still under development by the Westinghouse Owners Group. In a subsequent letter (NRC letter dated April 13, 1984) the NRC staff approved leaving the North Anna Reactor Vessel Head Vents manually valved out. This approval further demonstrates the limited safety significance of this finding.

A cause of several of the violations was inadequate administrative controls for handling and implementing Technical Specification, Regulation and License changes and not the surveillance program. We have also reorganized to provide increased management attention and resources for licensing and compliance issues, which include increased focus on various regulatory activities such as ISI and commitment control. Therefore, we request that you consider revising the Category III rating for the Surry surveillance area.

## SURRY AND NORTH ANNA POWER STATIONS

Functional Area: Emergency Preparedness

Rating: Category II (both stations)

We believe the Surry and North Anna Power Stations' Emergency Preparedness Programs greatly exceed the needed capability of providing the necessary protective measures to ensure the health and safety of the public. Our programs provide an effective mechanism whereby Virginia Power representatives can adequately respond to and mitigate the consequences of a station emergency. Various areas of the program have been frequently evaluated by the NRC and Virginia Power Quality Assurance inspectors to include selective examinations of procedures and records, personnel interviews, and observations of activities in progress. Results of these evaluations demonstrate that Virginia Power effectively supports the overall emergency preparedness effort.

The effectiveness of the Stations' Emergency Preparedness program has been successfully demonstrated through recent NRC inspections and exercises involving simulated emergency conditions, as well as during a new fuel shipment incident at NAPS, which occurred on June 28, 1984. Company management was instrumental in providing assistance to state and local authorities during the event, as noted in the SALP report.

The two level IV Violations, at both stations, identified early in the SALP period were promptly corrected. The weakness identified in the North Anna Power Station Emergency Drill scenario was promptly corrected prior to the exercise and our performance during the exercise was demonstrated to be in accordance with the regulations, plans and station procedures.

Other positive actions taken by Virginia Power to improve emergency preparedness:

- . Virginia Power continues to have a very favorable relationship with the State Department of Emergency Services and representatives of the local county governments.
- . The completion of the Local Emergency Operating Facility, and Technical Support Center facilities at the Surry Power Station. (North Anna facilities are currently under construction).
- . Increased reliability of the emergency equipment (re: EWS, telecommunications and Radiological Assessment).
- . Increased emphasis on Emergency Preparedness information exchange and interface with other utilities via NRC Region II Emergency Preparedness counterpart meetings.

Increased management attention and involvement as a result of adding an Assistant Station Manager at both stations and a corporate manager responsible for overall emergency preparedness.

Based on the above, it is clear that Virginia Power management has actively supported the emergency preparedness programs as evidenced by emergency exercise participation and regulatory issue resolution. Our response to NRC initiatives were timely and the training program has shown improvement in providing appropriate training for emergency response personnel. Therefore we request you reconsider the Category II ratings in the Emergency Preparedness at both stations.