

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

06 APR 21 09:59

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

April 15, 1986

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. 86-159  
NO/ETS/vlh  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Dr. Grace:

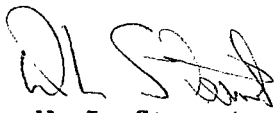
VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNIT NOS. 1 AND 2  
NRC INSPECTION REPORT NOS. 50-280/86-02 AND 50-281/86-02

We have reviewed your letter of March 7, 1986, in reference to the inspection conducted at Surry Power Station from January 7, 1986, to February 3, 1986, and reported in Inspection Report Nos. 50-280/86-02 and 50-281/86-02. Our response to the Notice of Violation is addressed in the attachment. This response was originally due to you on April 4, 1986. However, as a result of a phone call between Mr. A. Ignatonis and Ms. N. Clark on April 4, 1986, an extension was granted until April 16, 1986.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact me.

Very truly yours,

  
W. L. Stewart

Attachment

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PDR ADOCK 05000280  
Q PDR

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VIRGINIA ELECTRIC AND POWER COMPANY TO Dr. J. Nelson Grace

cc: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing-A

NRC Senior Resident Inspector  
Surry Power Station

Mr. Chandu P. Patel  
NRC Surry Project Manager  
PWR Project Directorate #2  
Division of PWR Licensing-A

RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED FROM JANUARY 7, 1986 TO FEBRUARY 3, 1986  
INSPECTION REPORT NOS. 50-280/86-02 AND 50-281/86-02

NRC COMMENT:

The following violation was identified during an inspection conducted on January 7 - February 3, 1986. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

10 CFR 50, Appendix B, Criterion XVI and Section 16 of the Licensee's accepted NPS Quality Assurance Manual require that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, adequate measures or procedures have not been established to assure that vendor identified conditions that may be adverse to quality, are promptly identified and corrected. For example, records of a 10 CFR Part 21 Report from Conval, Inc. to Vepco on October 11, 1982, and the corrective actions performed could not be retrieved as of February 3, 1986.

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

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

2. REASONS FOR THE VIOLATION:

10 CFR Part 21 reports are received at different levels and locations within the company. Prior to February 1984, procedures in place requiring documented review of vendor identified concerns were not specific for delineation of responsibilities. Generally, the information was forwarded to interested departments for review and action was taken as deemed appropriate. The Conval 10 CFR 21 Report cited above was issued prior to February 1984 and consequently documentation of the review was not maintained in an auditable manner.

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

With the evolution of the vendor interface program (February 1984), the 10 CFR Part 21 reports have been handled in the same manner as other vendor correspondence as required by the station administrative

procedures. Reports and correspondence are now being reviewed in accordance with Administrative Procedure 93, Vendor Interface/Control of Vendor Documents. Corrective actions identified by these reviews are being tracked by our commitment tracking system. Administrative Procedure 93 was revised to ensure that review of vendor recommendations is addressed and documented during the review of vendor information. The items identified in NRC Inspection Report Nos. 50-280/85-35 and 50-281/85-35 are being tracked in accordance with station administrative procedures to assure vendor information is reviewed and documented, and that corrective actions are implemented.

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

To enhance our vendor information review process, at the corporate level, a Nuclear Operations Department (NOD) standard defining requirements for capturing, tracking, and processing vendor information will be developed. Affected departments will receive clarification of the proper procedure for handling 10 CFR Part 21 reports. The associated station procedure, Administrative Procedure 93, will be revised as required to align with the NOD standard. A letter will be forwarded to affected employees with instructions to process 10 CFR Part 21 reports in accordance with the NOD standard.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved with the completion of actions identified in paragraph 3 above.