

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
SENIOR VICE PRESIDENT
POWER

July 28, 1989

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No. 89-495
NOS/TAH:jmj
Docket No. 50-280
50-281
50-338
50-339
License No. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
NOTICE OF VIOLATION IEIR 50-338&339/89-14 VIOLATION A
IEIR 50-280&281/89-17

We have received your letter of June 29, 1989, which transmitted the Notice of Violations from Inspection Report 50-338&339/89-14 for North Anna Power Station. We have also received Inspection Report 50-280&281/89-17 for Surry Power Station which addressed similar concerns.

Our response to the Notice of Violation, for Violation A of IEIR 50-338&339/89-14, is attached. The response to Violations B and C will be submitted under separate cover.

As discussed in the attached violation response, to ensure that we are able to provide the required independent review activities and to provide appropriate management support, we have taken the necessary actions to bring us into compliance with Technical Specifications and to ensure that future independent review activities will meet both the letter and the intent of the technical specifications. These actions include a rededication of the Director - Safety Evaluation and Control's responsibility to supervise and oversee the Independent Review group's activities. Also, we have instituted a Management Safety Review Committee (MSRC) which will provide a broad management overview of nuclear related activities and will act in an oversight role of independent review.

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The increased support of the independent review functions will provide a significant enhancement to our continued efforts in improving the safe operation of our nuclear stations.

Although a Notice of Violation was not issued for Surry Power Station in IEIR 50-280&281/89-14, a violation "essentially identical to Violation A in the Notice of Violation issued with North Anna Inspection Report 50-338,339/89-14" was discussed. This response addresses that violation as well as the subject North Anna violation.

If you have further questions, please contact us.

Very truly yours,



W. L. STEWART

Attachments:

cc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, GA 30323

Mr. J. L. Caldwell
NRC Senior Resident Inspector
North Anna Power Station

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

RESPONSE TO THE NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTION CONDUCTED
BETWEEN APRIL 18 AND MAY 31, 1989
INSPECTION REPORT NOS. 50-338/89-14 AND 50-339/89-14

NRC COMMENT

VIOLATION A

During the Nuclear Regulatory Commission (NRC) inspection conducted on April 18 - May 31, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, 53 Fed. Reg. 40019 (October 13, 1988) (Enforcement Policy), the violations are listed below:

A. Technical Specification 6.5.2.7 states in part that the following subjects shall be reviewed by the Independent/Operational Event Review Group:

- Written safety evaluations of changes in procedures as described in the Safety Analysis Report and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1).

This review is to verify that such changes, tests or experiments did not involve a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2) and is accomplished by review of minutes of the Station Nuclear Safety and Operating Committee and the design change program.

- Violations, REPORTABLE EVENTS and Special Reports such as:
 1. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance.
 2. Significant operating abnormalities or deviations from normal or expected performance or station safety-related structures, systems, or components; and
 3. ALL REPORTABLE EVENTS submitted in accordance with Section 50.73 to 10 CFR Part 50 and Special Reports required by Specification 6.9.2 .

Review of events covered under this paragraph shall include the results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

Contrary to the above, on May 25, 1989 that inspector determined, based on a review of the independent review program and discussions with licensee personnel, that the licensee's independent review group was not performing all of the document reviews required by Technical Specification.

This is Severity IV Violation (Supplement I) and applies to both units.

RESPONSE TO VIOLATION 'A'**1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION**

The violation is correct as stated.

2. REASON FOR THE VIOLATION

This violation was caused by a lack of Management involvement with independent/operating experience review activities. This included a failure to ensure an adequate growth of manning and resources as the independent/operating experience review requirements increased. Also, a lack of dedication to providing this function resulted in routine diversion of the already limited resources to other activities within the Nuclear Operations Department.

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

The following corrective actions have been implemented to enhance the independent review process.

- A study has been completed by an outside consultant which identified improvements for the independent review process at Virginia Power.
- Additional qualified reviewers have been obtained.
- Management has reaffirmed that the primary responsibility of the Director - Safety Evaluation and Control is to provide supervision of off-site independent review activities.
- The requirements of the Technical Specifications were reexamined to ensure that the complete set of required documents to be independently reviewed have been identified.
- Other utilities were surveyed to determine adequate staffing requirements. A staffing increase has been authorized and the hiring of additional independent review personnel has been initiated. In the interim, these positions are being filled by contract personnel.
- The backlog of independent review documents is being assessed.

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

Independent review activities are being evaluated to determine the appropriate manning and other organizational responsibilities. Virginia Power will be performing a resource allocation study in 1989 to determine the correct staffing and organizational alignments for ensuring an effective independent review function.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Virginia Electric and Power Company is taking action to ensure the Independent Review Program enhancements are completed by October 1, 1989. At that time, our Quality Assurance department will conduct an audit to verify that we are in full compliance with current Technical Specifications.