

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 7, 2019

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Serial No. 19-252
NAPS/ DPM R0
Docket Nos. 50-338
License No. NPF-4

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1
REPLY TO A NOTICE OF VIOLATION; EA-18-159

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company (Dominion Energy Virginia) herein provides a reply to NRC Notice of Violation EA-18-159, dated May 13, 2019.

Enclosure 1 provides Dominion Energy Virginia's response to the violation of NRC requirements specified in Notice of Violation EA-18-159. This enclosure provides: (1) the reason for the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

If you have any questions or require additional information, please contact Mr. Donald R. Taylor at (540) 894-2100.

Sincerely,



Daniel G. Stoddard
Senior Vice President and Chief Nuclear Officer

Enclosure:

1. Reply to a Notice of Violation; EA-18-159

IED1
RGN-II
NRR

cc: Ms. Catherine Haney
NRC Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
245 Peachtree Center Avenue, NE Suite 1200
Atlanta, GA 30303-1257

Mr. G. E. Miller
NRC Senior Project Manager – North Anna
U.S. Nuclear Regulatory Commission
One White Flint North
Mail Stop 08 B-1A
11555 Rockville Pike
Rockville, MD 20852-2738

NRC Senior Resident Inspector
North Anna Power Station

Mr. M. Harris
Old Dominion Electric Cooperative
Innsbrook Corporate Center
Suite 300
4201 Dominion Blvd.
Glenn Allen, VA 23060

Enclosure 1

Reply to a Notice of Violation
EA-18-159

Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1

NOTICE OF VIOLATION

"During an NRC investigation completed on October 16, 2018, and an NRC inspection completed on March 31, 2019, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the particular violation is set forth below:

Technical Specification 5.4.1.a, required in part, that written procedures shall be established, implemented, and maintained covering the following activities: The applicable procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A. RG 1.33, Appendix A, Section 1 included procedures for Equipment Control (e.g. locking and tagging) related to safety-related activities.

Licensee procedure OP-AA-200, "Equipment Clearance," implemented this requirement. Section 3.2.7, Tagout Holder/Lead Craft Acceptance of Tagout, of procedure OP-AA-200, required the first individual of each craft who will hold an equipment clearance to walk down that clearance prior to signing as a holder in the electronic database.

Contrary to the above, between September 10 and October 16, 2016, the licensee failed to adequately implement procedure OP-AA-200, "Equipment Clearance," Revisions 24 and 25, for certain safety-related maintenance activities (e.g., safety injection system and charging pumps). Specifically, the licensee willfully failed to ensure the first individual to hold the equipment clearance, performed the clearance walkdown and verified tagout boundaries, prior to signing as a holder in the electronic database and work commencing for safety-related maintenance activities.

This is a Severity Level IV violation (NRC Enforcement Policy Section 2.2.1)."

RESPONSE TO THE NOTICE OF VIOLATION

1. Reason for Violation

The non-compliant activity was determined to be isolated to an individual electrical maintenance supervisor who deliberately failed to meet the requirements of Dominion Energy procedure OP-AA-200, "Equipment Clearance." Specifically, the individual did not perform equipment clearance walk-downs prior to signing as a clearance holder in the electronic database prior to commencing work, as required by OP-AA-200.

2. Corrective Steps That Have Been Taken And The Results Achieved

A Condition Report (CR 1056554) was written on December 27, 2016, to document that a supervisor failed to verify a tagout as required by OP-AA-200. Document reviews and fact-finding interviews were conducted by the maintenance department to determine if such incidents were widespread or if this was an isolated case. The review concluded this behavior was isolated to one electrical maintenance supervisor. Appropriate action was taken in accordance with the performance management system. Standards were reinforced with all maintenance supervisors.

Subsequently during the second quarter of 2017, a detailed review of all electrical supervisor tagging activities was conducted by maintenance for the North Anna Unit 1 Fall 2016 refueling outage. This review also concluded that the non-compliant actions were isolated to a single individual, confirming the results of the first review under CR 1056554.

In summary, the fact-finding interviews concluded that the non-compliant actions were isolated to one individual and standards were reinforced with all maintenance supervisors. The deliberate actions of the individual electrical maintenance supervisor were handled in accordance with the performance management process.

3. Corrective Steps That Will Be Taken

The actions taken as a result of the fact-finding interviews and internal review are complete and sufficient for this event. No additional corrective actions are necessary.

4. The Date When Full Compliance Will be Achieved

After document reviews and fact-finding interviews, full compliance was verified on February 28, 2017 as documented in the station's corrective action program.