

USNRO REC
VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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July 17, 1979

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 532
PO/DLB:yfe
Docket Nos. 50-338
50-339
License Nos. NPF-4
CPPR-78

Dear Mr. O'Reilly:

We have reviewed your letter of June 25, 1979 in reference to the inspection conducted at North Anna Power Station on April 2 through May 11, 1979 and reported in IE Inspection Report Nos. 50-338/79-20 and 50-339/79-28. Our response to the specific violation is attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to the inspection report being made a matter of public record.

Very truly yours,

C. M. Stallings

C. M. Stallings
Vice President-Power Supply
and Production Operatins

Attachment

cc: Mr. Albert Schwencer

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OFFICIAL COPY

RESPONSE TO NOTICE OF VIOLATION

REPORTED IN IE INSPECTION REPORT NOS.

50-338/79-20 and 50-338/79-28

NRC Comment

As required by Criterion XVI of Appendix B to 10 CFR 50, conditions adverse to quality shall be documented and identified to appropriate levels of management. Section 16 of the Nuclear Power Station Quality Assurance Manual (NPSQAM) implements Criterion XVI for problems found during operation or preoperational testing. Paragraph 16.6.1.4.q(2) requires that deviation reports originating at operating stations which are reportable will be telecopied to the Director of Nuclear Operations as soon as reportability is determined. The Director of Nuclear Operations or his designee will determine if the deviation is considered potentially reportable for construction units, the deviation form and any additional information will be hand carried to the Project Engineer for stations under construction and the Executive Manager - Licensing & Quality Assurance. This is to ensure that proper review for reportability on the unit under construction is accomplished.

Contrary to the above, deviation report (DR) 79-211, which led to a Unit 1 licensee event report on May 4, 1979 involving construction fitup braces which were left in the exhaust ducting of the emergency diesel generators for Units 1 and 2 had not been delivered to the Project Engineer for Unit 2 to initiate a review for reportability per 10 CFR 50.55(e) and/or 10 CFR 21 on May 11, 1979.

Response

We agree that the subject item did not receive an appropriate review for reportability on Unit 2. However, the infraction, as stated, is not entirely correct. The following information is submitted in order to clarify our reporting procedures and to establish the appropriateness of our corrective actions.

Nuclear Power Station Quality Assurance Manual section 16, paragraph 16.6.1.4.q. defines procedures to insure that:

- 1) Problems discovered on construction units receive a review for applicability and reportability on operating units. Paragraph 16.6.1.4.q.(1)., provides for this review.
- 2) Problems determined to be reportable on operating units receive a review for applicability on construction units. Paragraph 16.6.1.4.q.(2)., provides for this review. As explained in paragraph 16.6.1.4.q., paragraph 16.6.1.4.q.(2)., was intended to apply only to items discovered on operating units.

The construction error involving the fitup braces in the emergency diesel generator (EDG) exhaust ducting was originally discovered by construction personnel on Unit 2. These construction personnel notified operations personnel of a potential problem on Unit 1. Unit 1 EDG exhaust ducting was inspected and found to have the same problem. A deviation report was issued on Unit 1. Since the item originated on a construction unit, and it was known that construction personnel at the site were aware of the item, the Director of Nuclear Operations designee did not forward the deviation to the Unit 2 Project Engineer. Unit 2 construction personnel did not consider the item reportable and did not initiate a form 883.6C.

1. Corrective steps taken and results achieved

Corrective steps taken include the following:

- 1) Construction personnel have been reinstructed on the procedures for initiating a review of a potentially reportable item.
- 2) In the future, deviation reports received by the Director of Nuclear Operations regarding items potentially reportable on construction units will be forwarded to the Unit 2 Project Engineer, regardless of the unit of origination, unless a form 883.6C covering the item has previously been received by the Director of Nuclear Operations. This will provide procedural redundancy for reporting of items discovered on construction units.

2. Corrective action taken to avoid further non-compliance

The above listed corrective actions are sufficient to prevent recurrence.

3. Date when full compliance will be achieved

Full compliance has been achieved.