

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

December 20, 1979 20

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. 935A/110779  
FO/RMT:scj  
Docket No: 50-338  
License No: NPF-4

Dear Mr. O'Reilly:

This is in reference to your letters of November 7, 1979 and December 7, 1979 and our letter of November 29, 1979 concerning your notice of violation reported in IE Inspection Report No. 50-338/79-40. Attached are revisions to our original responses which were forwarded as an attachment to our letter of November 19, 1979, serial no. 935/110779.

Very truly yours,

*C. M. Stallings*  
C. M. Stallings  
Vice President-Power Supply  
and Production Operations

Attachment

cc: Mr. Albert Schwencer

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RESPONSE TO NON-COMPLIANCE  
ITEM REPORTED IN IE INSPECTION REPORT  
NO. 50-338/79-40

A. NRC Comment

As required by Criterion V of Appendix B to 10 CFR 50 and as implemented by Section 5 of VEPCO Nuclear Power Station Quality Assurance Manual, "Activities affecting quality shall be prescribed by documented instructions, procedures and drawings . . . and shall be accomplished in accordance with these instructions, procedures and drawings." Paragraph 3.3 of W-NSD Procedure ISI-11, the applicable procedure for liquid penetrant surface inspection during inservice inspection, requires removal of excess penetrant prior to development.

Contrary to the above, on October 11, 1979, for welds 5, 7, 8, 9 and 10 on ISO VRA-1-4109, excess penetrant was not adequately removed resulting in a surface too pink for proper evaluation. The level II examiner accepted the test as a valid test.

This is an infraction.

Response

The above infraction is correct as stated. Specifically, pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is submitted.

1. Corrective steps taken and results achieved:

The welds in question were satisfactorily reexamined on October 12, 1979. Surveillance was conducted on several subsequent examinations and they were also performed satisfactorily.

2. Corrective steps which will be taken to avoid further non-compliance:

The contractor involved was cautioned that the quality of liquid penetrant testing must be improved and in the future, contractors will have more surveillance by Vepco NDT personnel during liquid penetrant testing. This particular problem was discussed with the specific contractor employee. Surveillance of his work indicated that the problem was corrected.

The individual involved performed a total of 39 examinations. Eleven (11) of these examinations (which includes the five welds listed above) will be reexamined.

3. Date when full compliance will be achieved:

Full compliance will be achieved on December 31, 1979.

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