

RICHMOND, VIRGINIA

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

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April 23, 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. 219  
PO/FHT:scj  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
CPPR-78

Dear Mr. O'Reilly:

We have reviewed your letter of March 29, 1979, in reference to the inspection conducted at North Anna Power Station Unit Nos. 1 and 2 on February 5 to March 2, 1979, and reported in I.E. Inspection Report Nos. 50-338/79-09 and 50-339/79-14. Our response to the specific infraction is attached.

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

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  
ITEMS REPORTED IN IE INSPECTION REPORT NOS.  
50-338/79-09 and 50-339/79-14

NRC Comment

As required by Criterion V of Appendix B to 10 CFR 50 and Section 17.2.5 of your Topical Report for Operations Quality Assurance (VEP-3A), activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with those instructions or procedures. Station Administrative Procedure 104, Implementation of Architect-Engineer Construction Design Changes After Receipt of Operating License, requires that design change packages be reviewed for completeness and that this review be indicated by affixing the reviewer's signature and date to the A-E Construction Design Change Review Form.

Contrary to the above, Station Administrative Procedure 104.0, was not followed in that the cover form for Construction Design Change, NAL-EC-78-40 was signed to denote completion on December 6, 1978, with Revisions 2, 3, and 4, so this design change still incomplete.

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:

An investigation into the event was made. It was determined that the initial ADM 104.0 design change package had been completed, reviewed and processed in accordance with established procedures. However, field changes to the design change package had been initiated and had not been completed. The field changes were missed since their status is not recorded on the ADM 104.0 cover sheet which is attached in the design change package. To correct this, the completed field change was audited by QC. Upon the completion of their audit, the design change was then processed as complete. Also, all previously completed ADM 104.0 design changes are being reviewed to assure that they were processed correctly.

2. Corrective action taken to avoid further non-compliance:

The ADM 104.0 cover sheet is being modified to correct this procedural error. Spaces will be added to the cover sheet for field changes to be recorded as they are approved. It will then be possible, by merely examining the cover sheet, to determine what and how many field changes have been implemented.

3. Date when full compliance will be achieved:

Revision of the ADM 104.0 cover sheets will be completed by May 15, 1979.

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