

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

March 26, 1980

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. O. D. Parr, Chief  
Light Water Reactors Branch 3  
Division of Project Management  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 277  
PO/DLB:baw  
Docket No. 50-339

Dear Mr. Denton:

Subject: Safety Engineering and Operating  
Experience Evaluation

In response to the Short Term Lessons Learned Requirements and the recommendations of the NRC Action Plan, NUREG 660, we have made changes to both our station and system organizations which will provide additional assurance that our nuclear facilities are maintained and operated in a safe manner. These organizational changes address the Shift Technical Advisor and the operational experience assessment functions required by NUREG 0578 as well as the onsite safety engineering group recommended in NUREG 660. Following is a description of these organization and staffing changes.

Safety Engineering Staff

As recognized in NUREG 660, the safety review function, operating experience evaluation function and the Shift Technical Advisor function are directly related and overlap in many areas. Accordingly, we have combined these functions under a single organizational unit which we have designated the Safety Engineering Staff (SES). The SES will be comprised of a system level SES and a SES at each station.

System SES

The System SES will initially include a Director of Safety Engineering and two staff members. The Director of Safety Engineering will report to the Manager, Nuclear Technical Services. The Manager, Nuclear Technical Services will allocate a portion of his time to the safety engineering and operations evaluation functions. The Director, Safety Engineering and his staff will be dedicated full time to these activities. The experience and qualifications of the System SES as of April 1, 1980, will be as follows:

Manager, Nuclear Technical Services  
B.S. Nuclear Physics  
MS Nuclear Engineering  
Ph.D. Nuclear Engineering  
13 years nuclear generation experience

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Director, Safety Engineering  
B.S. Electrical Engineering  
SRO License (Expired) - Surry Power Station  
8 years nuclear generation experience

Staff members

- 1) Associate Engineer  
B.S. Nuclear Engineering  
4 years nuclear generation experience
- 2) Engineering Technician  
RO License (Expired) - Surry Power Station  
2 years operations experience at Surry  
4 years naval reactors experience

The System SES will ultimately be expanded to six to eight members as personnel changes are completed.

The System SES also has available a large number of specialists for consultation in their areas of expertise, including chemistry, health physics, metallurgy, fuel design, thermal hydraulics, structural design, etc. The Director, Safety Engineering is also authorized to retain outside consultants whenever he considers it necessary to evaluate and resolve safety concerns.

Station SES

The Station SES will include a Supervisor, Safety Engineering and five to eight staff members. The Supervisor, Safety Engineering will report administratively to the Superintendent of Technical Services. However, the Station SES will work very closely with the System SES in the identification, evaluation and resolution of safety concerns. The Station SES, in cooperation with the System SES, will keep senior management informed on all plant specific and generic safety issues. A portion of the SES will be designated Shift Technical Advisors. The current qualification and experience of the members of the North Anna Station SES are as follows:

Superintendent, Technical Services  
B.S. Nuclear Engineering  
SRO License (Expired) - Surry Power Station  
9 years nuclear generation experience

Supervisor, Safety Engineering

B.S. Electrical Engineering  
SRO License - North Anna Power Station Units 1 and 2  
5 years nuclear generation experience

### Staff members

All members of the Station SES will perform the operations experience assessment and the safety engineering functions. A number of the engineers in the station SES who have sufficient experience will be designated STAs. Those who are designated STAs will have at least 18 months of nuclear plant experience. All staff members will have at least one year of nuclear plant experience.

Those members of the Station SES who are designated STAs will share a rotating duty schedule which will result in their being available for safety engineering and operations assessment activities approximately twenty-four hours per week. An STA, therefore, contributes to the safety engineering and operations assessment activities the equivalent of approximately 60 percent of a full time individual. Our minimum staffing plans for the Station SES include the Supervisor and five staff members, four of which will share STA duties. Since the Supervisor and one staff member will be assigned to the engineering and assessment activities full time and the four STAs are available part time, an equivalent of over four full time individuals will be available at the site to perform the safety engineering and operations assessment functions. This is in addition to the three full time members of the System SES.

### Safety Engineering Staff Functions

The functions of the Safety Engineering Staff are as follows:

1. The SES will maintain a continuing oversight and evaluation of station operations and maintenance from a safety perspective. The station SES will provide a continuing comprehensive review of the safety of station operations. This includes a daily review of the physical condition of the station and equipment, a review of significant operational events and an overall assessment of the plant staff performance regarding their conformance to requirements related to safety. Items of concern will be brought to the attention of both the station manager and the Director, Safety Engineering.
2. The Station SES will provide the STA function. A member of the Station SES will be onsite at all times to provide technical advice to the operations staff in the event of abnormal transient or accident conditions.
3. The SES will evaluate the operating experiences at our facilities to identify any needed improvements in station design, personnel training, administrative controls, or in operational practices and procedures. This includes an indepth evaluation of all significant operational events.

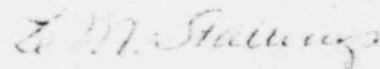
4. The SES will evaluate industry operating experiences and technical information to identify any needed improvements in station design, training, administrative controls, or in operational practices and procedures. In order to eliminate the duplication of certain review and evaluation activities, the review of industry operating experience and generic information will be conducted by the System SES. Site specific reviews will be conducted by the Station SES.
5. The SES will provide an independent review of design changes, procedural changes, special tests, and changes to Technical Specification.

#### Conclusion

The Safety Engineering Staff is a long term commitment to address the recommendations of NUREG 0578 and 660 and to strengthen the technical support and evaluation of our nuclear operations. We have assigned the equivalent of over seven full time individuals to the safety engineering and operations assessment functions. We consider these changes to be a significant positive step not only in the substantial commitment of technical resources but in the permanence of the Safety Engineering Staff.

We will be glad to answer any questions you may have.

Very truly yours,



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

cc: Mr. James P. O'Reilly