

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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February 12, 1981

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

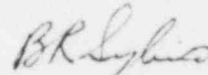
Serial No. 1016A
NO/RMT:ms
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

By Vepco letter Serial No. 1016 dated January 12, 1981 we forwarded responses to Inspection Report Nos. 50-338/80-26 and 50-339/80-31. As per telecon between B. R. Sylvia and R. C. Lewis on January 22, 1981, we are hereby submitting revised, supplemental information to that letter.

Should you have any further questions or require any additional information, please contact this office.

Very truly yours,



B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

cc: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing

3103050776

SUPPLEMENTARY RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM AUGUST 21 THROUGH SEPTEMBER 30, 1980

C. NRC Comments

As required by Technical Specification 6.8.2, applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 and changes thereto shall be reviewed by the SNSOC and approved by the Station Manager prior to implementation. Appendix "A" of Regulatory Guide 1.33 paragraph 9 specifies maintenance procedures that can affect the performance for maintenance of the emergency diesel generator engines directs the technician, in Steps 5.1 and 5.3, to disassemble and reassemble, according to the procedures in the Colt Industries Service Manual.

Contrary to the above, Colt Industries Service Manual for Model 3800 TD8-1/8 diesel engine procedures for disassembly and reassembly of the emergency diesel generator engines, safety-related equipment, were not reviewed by the SNSOC or approved by the Station Manager. Further, no controls exist to insure that the service manual used by the technician is complete and up to date.

This is an infraction for both units.

Response

North Anna presently uses approximately 18,000 procedures, the majority of which are classified as "safety related", in the operation and maintenance of the station. Of these 18,000 procedures, approximately 1,200 require the performer to use vendor's technical manuals to perform the procedure. These are all procedures used to perform maintenance or calibration and consist of some, but not all, of the Mechanical Maintenance Procedures (MMP's), Electric Maintenance Procedures (EMP's), Instrument Maintenance Procedures (IMP's), and Instrument Calibration Procedures (ICP's).

Those procedures which use technical manuals can be classified as either specific or generic in nature. Specific procedures apply to one specific piece of equipment. Generic procedures apply to a type of equipment, such as valves, which may be manufactured by a number of different vendors.

In the case of specific MMP's, EMP's, IMP's, and ICP's, the procedure will call for the performer to use a specific section of a specific technical manual to perform the repair or calibration.

In the case of generic MMP's and EMP's used to troubleshoot and repair valves, pumps, breakers, etc., the procedure will call for using the applicable technical manual as a reference for handwriting into the procedure the steps to be followed. This will be done by a foreman, with subsequent review by a supervisor and a quality control representative prior to performing the steps. In no case does an Operating Procedure (OP), which is used to operate safety related equipment, or a Periodic Test Procedure (PT), which is used to demonstrate operability of safety related equipment, require the use of a technical manual to perform the procedure.

There are approximately 1100 different types of vendor's technical manuals for North Anna Units 1 and 2 equipment, with approximately 10 copies of each manual. To establish and maintain control of these manuals requires a considerable effort in manpower. We have been proceeding with this effort for some time now and have recently assigned one person from our records group full time to this task and will assign a second person to this task in the near future.

Our present schedule calls for, by June 1, 1981, identifying those technical manuals used by specific safety related procedures, determining their location, verifying that they are all of the same revision, establishing a method of insuring that future revisions are entered in all of them. The same will be done for technical manuals used by generic safety related procedures by September 1, 1981. The program for all safety related technical manuals will be implemented by January 1, 1982.