VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 2, 1980

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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. 1171B/121979 NO/RMT:ms Docket No. 50-338 License No. NPF-4

Dear Mr. O'Reilly:

As committed to in our letter Serial No. 1171A dated September 17, 1980 regarding the results of a follow-up inspection conducted at North Anna Power Station on September 11 through September 12, 1980, we are forwarding the attached supplemental response.

Very truly yours,

B. R. Sylvia Manager - Nuclear Operations and Maintenance

Enclosure

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

RESPONSE TO NOTICE OF VIOLATION ITEMS REPORTED IN IE INSPECTION REPORT 50-338/79-47

A. NRC Comment

As required by Criterion V of Appendix B to 10 CFR 50 and implemented by Vepco Topical Report VEP-1-A Section 17, paragraph 17.2.5 specifies in part, that activities affecting quality are accomplished in accordance with instructions, procedures, and drawings. General Welding Procedure W-1.0 Rev. 1 invokes ASME Section IX (74.W76) which under paragraph QW-2013, requires that each welding process or procedure be qualified either separately or in combination with other processes or procedures ...for the deposited weld metal thickness range for each of the processes or procedures...paragraph QW-351 of the same code requires that the limit of thickness of the weld he deposits with each welding process.

Contrary to the above, on November 16, 1979, procedure qualification records of weld process specifications and welder performance qualifications involving combination processes did not indicate the weld metal thickness deposited with each welding process.

This is an infraction.

Response

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:

Corrective steps taken and results achieved:

A review was conducted of records to ascertain if any procedures in W-1.0 involving combined processes have been applied at North Anna and it has been determined that no multiple process procedures have been used to complete any repairs since unit start-up. All individual welding processes, GPA and SMAW, were performed in accordance with specifications on procedure sheets contained in the Vepco Weld Manual.

- Corrective steps which will be taken to avoid further noncompliance:
 - We believe no further corrective action is required on this item.
- Date when full compliance will be achieved:

Full compliance has been achieved.