

APPENDIX A

NOTICE OF VIOLATION

Virginia Electric & Power Company
North Anna

Docket Nos. 50-338 & 339
License No. NPF-4 & NPD-7

As a result of the inspection conducted on February 1, - March 5, 1981 in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. 10 CFR 50, Appendix B, Criterion XVI and Virginia Electric and Power Company's (VEPCO) approved Topical Report - Quality Assurance Program Operations Phase, Section 17.2.16, requires measures to assure that the cause of a significant condition adverse to quality is determined and corrective action taken to preclude recurrence. A significant condition adverse to quality was identified and reported to the Nuclear Regulatory Commission (NRC) on January 11, 1979 concerning the failure of the Axial Power Distribution Monitoring System (APDMS) to subtract the background detector current signal from the measured flux signal. VEPCO letters to the NRC dated February 16 and 27, 1979 stated that an administrative procedure requiring the reactor operator to review flux traces in order to characterize detector background levels was in use on Unit 1 and would be established on Unit 2.

Contrary to the above, measures established to ensure corrective action for identified deficiencies was ineffective in that:

1. A Unit 2 flux map, 12-126, obtained October 31, 1980, indicated abnormally high background detector levels and was not identified by the plant staff to preclude detector input to the APDMS.
2. Station procedures did not specify detector background level limits nor require any review of the data until identified by the inspector during December 1980.

This is a Severity Level V Violation (Supplement I.E.) and applicable to Units 1 and 2.

Similar items were identified to you in our correspondence transmitting Inspection Report Nos. 50-338/80-41, 50-339/80-38, and 50-338/80-38.

- B. 10 CFR 50, Appendix B, Criterion V, and VEPCO approved Topical Report - Quality Assurance Program - Operations Phase, Section 17.2.5, requires that activities affecting quality shall be prescribed by documented procedures appropriate to the circumstances and shall be accomplished in accordance with these procedures. Nuclear Power Station Quality Assurance Manual Section 6 and Engineering Administrative Procedures 1 and 2 specifies

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processing of the Setpoint Change Request Form to insure proper review, subsequent change of engineering documents, and document retention in the records vault.

Contrary to the above, Review of 33 Setpoint Change Request Forms for the period February 1978 to February 1980, determined that none were filed in the records vault, three were not reviewed for document revision and nine were not reflected on the appropriate engineering documents

This is a Severity Level V Violation (Supplement I.E.) and applicable to Unit 1 and 2.

- C. 10 CFR 50.59 requires that records of changes to the facility described in the safety analysis report include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, of thirteen setpoint changes, requiring safety evaluations, reviewed for the period February 1978 to February 1980, eleven were not accompanied by a safety evaluation. Additionally, the Nuclear Power Station Quality Assurance Manual Section 6, which prescribes the methods and requirements for making changes to setpoints of safety related instrumentation and controllers, did not specify that a safety evaluation be completed.

This is a Severity Level V Violation (Supplement I.E.) and applicable to Units 1 and 2.

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: APR 10 1981