

USNRC REGION II
VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

81 MAY 27 A 8:39
May 22, 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. 280
NO/RMT:ms
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of April 28, 1981 in reference to the inspection conducted at North Anna Power Station between March 23-27, 1981 and reported in IE Inspection Report Nos. 50-338/81-10 and 50-339/81-06. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

B. R. Sylvia
B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

City of Richmond
Commonwealth of Virginia
Acknowledged before me this 22nd day of May, 1981

Ann C. Meese
Notary Public

My Commission expires: 2-26, 1985

SEAL

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

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THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

RESPONSE TO NOTICE OF VIOLATION
ITEMS REPORTED DURING NRC INSPECTION
CONDUCTED FROM MARCH 23-27, 1981

NRC COMMENT

Appendix B Technical specification 5.3.2.2.a requires that an audit of the conformance of facility operation to the provisions contained within the Environmental Technical Specifications and applicable license conditions shall be completed at least once per 12 months.

Contrary to the above, inspection of audits conducted during calendar year 1979 and 1980 disclosed the findings listed below.

1. Audit of the conformance of facility operation to the provisions contained within Environmental Technical Specification 3.2, which defines the radiological environmental monitoring requirements, was not completed during calendar year 1980.
2. Audit No N-79-38 of the radiological Environmental Technical Specification 3.2 was inadequate based upon failure of the audit to include radiochemical analyses of environmental samples required by the subject specification provisions.

This is a Severity Level V Violation (Supplement VII.E.).

RESPONSE

1. Admission or Denial of the Alleged Violation

The Notice of Violation for Item one (1) is correct as stated.

The Notice of Violation for Item two (2) is correct as stated. The radiochemical analysis, as completed by Teledyne Isotopes, Inc., was verified by a corporate Quality Assurance Vendor's Surveillance Audit in September of 1978, nine months prior to conducting Audit No. N-79-38. However, this audit (N-79-38) and its reference to the service of Teledyne Isotopes was not subsequently validated in a 1979 annual audit of the contractors' analytical Quality Assurance/Quality Control procedures and program.

2. Reasons for the Violation

Item one (1) of this infraction was due to administrative error. Neither the Station nor corporate Quality Assurance groups were aware that the radiological portion of the Environmental Monitoring Audit had not been completed for the 1980 year.

Item two (2) of this infraction was due to scheduling of the corporate Quality Assurance Vendor Surveillance Audit of Teledyne Isotopes, Inc. every three years instead of annually as required by Environmental Technical Specification 5.3.2.2.a. The requirement for an annual audit of the contractor's services had apparently been misinterpreted.

3. Corrective Steps Taken and Results Achieved

For item one (1) of the infraction an audit of the radiological and non-radiological environmental monitoring requirements has been initiated.

For item two (2) an audit of the contractor's services will be scheduled to be completed in 1981.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

With reference to item one (1) of the infraction, an Environmental Monitoring Audit is to be scheduled annually to include both radiological and non-radiological aspects of the Environmental Technical Specifications. The audit schedule issued by the Quality Assurance Department will further insure that the referenced audit is completed.

For item two (2) of the infraction, an audit of the contractor's (Teledyne Isotopes, Inc.) services will, in the future, be scheduled and completed on an annual basis. In addition, the term "periodic basis" as used in section 3.3 of procedure H.P.-REMM-9 (Quality Assurance) in reference to conformance of Teledyne's analysis of environmental samples to applicable standards will be changed to conform to the minimal annual audit condition imposed by Environmental Technical Specifications 5.3.2.2.a.

5. Date When Full Compliance Will Be Achieved

Full compliance for item one (1) of the infraction will be achieved on or about June 1, 1981.

Full compliance for item two (2) of the infraction, as redefined in section one of the response, will be completed on or about December 31, 1981.