

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 3, 1990

90 DEC 10 P3:10

Mr. Stewart D. Ebnetter
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Serial No. 90-667
NL&P/JYR:R7
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
RESPONSE TO INSPECTION REPORT 50-338&339/90-22
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Virginia Electric and Power Company has reviewed the initial report dated October 23, 1990 on the Systematic Assessment of Licensee Performance (SALP) for the period of June 1, 1989 through August 31, 1990 for North Anna Power Station. On November 7, 1990 we met with you and members of your staff to discuss the assessment.

The recognition of the strengths noted in the report was appreciated, and we are committed to building upon those strengths. Also, we will make every effort to strengthen our performance in those areas where weaknesses were identified. After reviewing the report, we have comments regarding the SALP board's assessment in the functional areas of Radiological Controls and Security.

In the functional area of Radiological Controls a Category 2 rating was assigned. The principle reason for the Category 2 rating cited by the SALP board was the high collective dose during the assessment period. Our assessment is that North Anna's collective exposure has continued to decline from previous years. The reduced exposure experienced during this SALP period reflects programs that have been implemented and are expected to reduce future dose. Lastly, it appears that some of the SALP board observations regarding the collective doses during planned refueling outages included events that occurred outside the assessment period. The attachment provides further information that we hope you will consider in the development of the final SALP report.

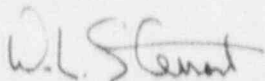
11
150/

In the functional area of Security, the report's Summary of Results might be interpreted such that a reader could draw the conclusion that a pervasive drug problem exists at North Anna. We request that the summary be reviewed and revised to reflect that the event of concern was an isolated instance and did not involve a drug issue on site. In addition, the Summary of Results described the performance of Security as "satisfactory during the assessment period, but declined from the last period." The attachment provides further information regarding the performance of Security during the assessment period that we hope you will consider in the development of the final SALP report.

Your consideration of our comments in determining the final assessment in these functional areas is appreciated. It is our position that both the radiological protection and security areas have performed in a superior manner during the SALP period and consideration of Category 1 rating is recommended.

Finally, one editorial comment is provided in the attachment. If you have any questions or require additional information regarding our comments, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

Virginia Electric and Power Company
North Anna Power Station
Comments on the Initial SALP Report

Radiological Controls

Radiological Controls received a Category 2 rating in the initial SALP report. The report documented actions underway to improve our performance in this functional area, but also highlighted continuing NRC concerns. The SALP board stated that despite the dose reduction initiatives during the assessment period, overall collective dose remained high. The SALP board further commented that additional management emphasis on the pursuit and effective implementation of good ALARA practices was warranted.

In our view, Virginia Electric and Power Company has a very strong commitment to reducing radiation exposure. This is exemplified by both our ongoing programs which have reduced radiation exposure and our commitment to implement additional changes that will continue to result in dose reductions in the future. As acknowledged in the SALP report, you are aware of several effective dose reduction measures and practices currently implemented. Those include programs such as source term reduction, improved job planning, and increased management attention through reports and trending analyses.

The SALP board's assessment that our overall collective dose remained high is somewhat misleading. The SALP assessment period covered June 1, 1989 through August 31, 1990. During this evaluation period, North Anna's exposure normalized to one year was 201 man-rem per unit, and the total exposure during the SALP period was less than 252 man-rem per unit. As a comparison, the 1989 industry average based on AEOD data was 337 man-rem per unit. For 1990, which included a major refueling and ten years Inservice inspection outage of 72 days, the North Anna exposure is currently 302 man-rem per unit.

These results directly reflect the aggressive management involvement in and the effectiveness of the ALARA and source term reduction programs during both outage and non-outage operations. Also, the collective dose incurred during the 1989 Unit 1 outage have already been considered by the SALP board and was documented in the previous SALP report (see page 15 of IR 89-16 dated August 15, 1989).

The major contributor to collective personnel exposure at North Anna is the extensive inspection of steam generators that occur each outage. The scope of the steam generator inspection and plugging activities routinely exceeds that required by the Technical Specifications and results in approximately one-third of collective radiation exposure received. However, we believe that this additional exposure has been and continues to be warranted to better assure a high state of operating nuclear safety.

Based on the above, we recommend that Radiological Controls be considered for a Category 1 rating in the final SALP report.

Security

Security received a Category 2 rating in the initial SALP report. Two NRC inspections in the functional area of security were conducted during the assessment period (April 23-27, 1990 and July 9-13, 1990) and documented in Inspection Reports 90-08 and 90-17, respectively. Those inspections were, from our perspective, a major input to the SALP board's deliberations and assessment of Security at North Anna. Based on these inspection reports, no programmatic or performance issues were identified. As a result, we have two comments on the SALP Summary of Results.

Our first comment involves the phrase "a problem with follow-up of a drug issue at the site" that was used in page 5 the Summary of Results. The use of the phrase "drug issue" is open to many, often detrimental, interpretations. NRC Inspection Report 90-17 documents NRC follow-up to an anonymous allegation regarding the discovery of a possible illegal substance outside of the Protected Area and a breakdown in communications that occurred between the site Security organization and the Louisa County Sheriff's Department. When identified, immediate corrective actions to enhance the notification process were implemented and policies were established to ensure proper follow-up in the future. We feel that those actions will preclude any future communications breakdown. To our knowledge, this was the first breakdown in communications experienced within the Security organization. NRC's evaluation of the circumstances of the event determined that a violation of regulatory requirements had not occurred.

Our second comment is the phrase "satisfactory during the assessment period, but declined from the last period" used in page 4 of the Summary of Results. NRC Inspection Report 90-08 identified two non-cited violations, one in the area of access control and one in the area of inadequate searches. Those concerns were immediately corrected and did not reflect programmatic breakdowns. Those corrective actions have been successful.

NRC Inspection Report 90-17 also stated: "Inspection findings confirm continued improvement in the effectiveness of the security program. Security personnel appear to be motivated and professional in their approach to duty performance." We feel that this statement better represents Security's performance during the SALP period, in contrast with the phrase used in the Summary of Results.

Based on the above, we recommend that Security be considered for a Category 1 rating in the final SALP report.

Editorial Comment

A sentence on page 5 under Plant Operations, second paragraph, seems to be missing a word. It appears to us that the sentence should read: "Significant progress was made in this area [that or which] was identified as needing improvement during the last assessment period."