



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

JUN 25 1984

Report Nos.: 50-338/84-15 and 50-339/84-14

Licensee: Virginia Electric and Power Company
Richmond, VA 23261

Docket Nos.: 50-338 and 50-339

License Nos.: NPF-4 and NPF-7

Facility Name: North Anna 1 and 2

Inspection Dates: May 29 - June 1, 1984

Inspection at North Anna site near Mineral, Virginia

Inspector: *JH Jackson for*
G. A. Bevisle

June 21, 1984
Date Signed

Accompanying Personnel: H. C. Whitcomb, III, Region II

Approved by: *JH Jackson for*
C. M. Upright, Section Chief
Quality Assurance Program
Division of Reactor Safety

June 21, 1984
Date Signed

SUMMARY

Areas Inspected:

This routine unannounced inspection involved 52 inspector-hours on site in the areas of licensee action on previous enforcement matters, non-licensed personnel training, and licensed operator requalification training program.

Results:

Of the three areas inspected, no violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

- R. Berquist, I&C Supervisor
- *M. Bowling, Assistant Station Manager
- M. Critchfield, Maintenance Electrician
- *S. Eisenhart, Licensing Coordinator
- A. Francis, I&C Maintenance
- *W. Harrell, Plant Manager
- J. Heathfield, I&C Maintenance
- *A. Hogg, Jr., QA Manager
- H. Hyer, Mechanical Foreman
- P. Lienhart, Electrical Training Coordinator
- J. Lowman, Nuclear Training Coordinator
- D. Lurk, Maintenance Mechanic
- J. May, I&C Training Coordinator
- *C. Meyer, Supervisor Training - Power Station Operations
- *G. Pederson, Supervisor Training - Power Station Support
- H. Perkinson, Jr., Maintenance Mechanic
- *W. Pherls, Senior Training Specialist, Nuclear Training Assessment
- D. Richardson, Maintenance Electrician
- *B. Shriver, Superintendent - Nuclear Training
- E. Sinclair, Electrical Supervisor
- R. Stiles, Mechanical Training Coordinator

Other licensee employees contacted included technicians, mechanics, security force members, and office personnel.

NRC Resident Inspector

*M. Branch, Senior Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on June 1, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged an apparent deviation discussed in paragraph 3.a of this report. This matter was discussed by telephone on June 15, 1984, with appropriate VEPCO quality assurance personnel. Based on additional clarifying information provided during this discussion, the VEPCO representatives were informed that our original concern had been resolved and a Notice of Deviation will not be issued.

3. Licensee Action on Previous Enforcement Matters

- a. (Closed) Severity Level IV Violation 338/83-01-01, 339/83-01-01:
Failure to perform all audits required by Technical Specification 6.5.3.1.c.

Licensee responses dated March 8 and 17, 1983, were considered acceptable by Region II. The inspector interviewed QA personnel about the conduct of Audit N-82-04. During these interviews, it was identified that this audit was completed January 20, 1983. The licensee response stated that this audit was completed the week of December 27, 1982, and based on this completion, full compliance had been achieved. This matter was discussed as an apparent deviation during the exit interview at the conclusion of the inspection.

A telephone discussion was conducted between Region II Quality Assurance Program Section personnel, VEPCO Corporate QA, and North Anna site QA personnel on June 15, 1984. During the conversation, VEPCO personnel clarified that the completion date mentioned in VEPCO correspondence dated March 17, 1983, could have been misinterpreted by NRC inspection personnel. Audit N82-04 had been initiated as stated in Inspection Report 50-338/83-01 and 50-339/83-01 but was not completed until January 20, 1983. Paragraph 6 of these reports states that this audit was completed during the week of December 27, 1982. This misunderstanding of verbal information was the probable basis for the date given in the VEPCO response.

Based on this clarification, a deviation will not be issued for failure to complete this audit as stated in the licensee correspondence. The inspector concluded that the licensee had determined the full extent of the violation, taken action to correct current conditions, and developed corrective actions needed to preclude recurrence of similar problems.

- b. (Open) Severity Level IV Violation 338/83-01-02, 339/83-01-02:
Failure to Establish a System to Evaluate Equipment Failures.

The final completed due date for this violation is July 31, 1984. Corrective action for this item will be inspected at a later date.

- c. (Closed) Severity Level V Violation 338/82-01-02, 339/82-01-02:
Failure to Maintain Controlled Documents.

The licensee response dated March 12, 1982, was considered acceptable by Region II. The QA Operations and Maintenance Instruction Manual has been superseded by the QA Department Instruction Manual. This manual was written due to a QA reorganizational change and was issued August 26, 1983. This manual is up-to-date. The inspector concluded that the licensee had determined the full extent of the violation, taken action to correct current conditions, and developed corrective actions needed to preclude recurrence of similar problems.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Non-Licensed Personnel Training (41700)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
 - (b) Regulatory Guide 1.8, Personnel Selection and Training, September 1975
 - (c) ANSI/ANS-3.1-1978, Selection and Training of Nuclear Power Plant Personnel
 - (d) Regulatory Guide 8.13, Instruction Concerning Prenatal Radiation Exposure
 - (e) Technical Specifications

The inspector reviewed the licensee training program required by references (a) through (e) to verify that the program had been established in accordance with regulatory requirements, industry guides and standards, and Technical Specifications. The following criteria were used during this review to determine the overall acceptability of the established program:

- The program complies with regulatory requirements and licensee commitments.
- The program covers training in administrative control areas and procedures, radiological health and safety, industrial safety, security procedures, the emergency plan, quality assurance, fire fighting, and prenatal radiation exposure.
- Non-licensed personnel were trained in functions they perform including related technical and on-the-job training where required.

The documents listed below were reviewed to verify that previously listed criteria had been incorporated into licensee training programs:

- TAG 4.2.1, General Employee Training, Revision 1
- TAG 4.2.2, General Employee Retraining, Revision 2
- TAG 4.2.3, Advanced General Employee Training, Dated 02/13/84
- ADM-2.3, General Employee Training, Dated 11/08/83
- ADM-2.7, Nuclear Instrumentation Technician Development Program, Dated 03/31/83

ADM-2.8, Electrician Development Program, Dated 12/14/83

ADM-2.9, Mechanic Development Program, Dated 03/28/84

I&C Personnel Qualification Record, Dated 09/06/83

I&C Personnel Qualification Standard, Dated 08/18/83

Nuclear Instrumentation Technician Development Program, Introduction to 7300 Process Instrumentation Lesson Plan

Nuclear Instrumentation Technician Development Program, Nuclear Instrumentation System Lesson Plan

Electrical Maintenance Training, Electrical Trouble Shooting Lesson Plan

Electrical Maintenance Training, Basic Motor Control Theory Lesson Plan

Mechanic Continuing Training, Mechanical Theory: Threaded Fasteners Lesson Plan

The inspector reviewed specific training provided to the mechanical, electrical, instrumentation and control maintenance personnel, and general employee training (GET) provided to all personnel requiring entry into radiation controlled areas. The inspectors interviewed training coordinators from the mechanical, electrical, instrumentation/control, and general employee training divisions. Interviews were conducted with three individuals from each of the different maintenance divisions to evaluate the technical content and effectiveness of the training. The inspectors verified that prenatal radiation exposure requirements were given to female employees entering radiation controlled areas. The inspectors also verified that GET requirements had been administered to approximately 30 personnel requiring access to radiation controlled areas.

Within this area, no violations or deviations were identified.

6. Licensed Operator Requalification Training Program (41701)

- References:
- (a) 10 CFR 55, Appendix A, Requalification Programs for Licensed Operators for Production and Utilization Facilities
 - (b) NUREG-0737, Clarification of TMI Action Plan Requirements
 - (c) Technical Specifications
 - (d) Regulatory Guide 1.8, Personnel Selection and Training, September 1975

- (e) ANSI/ANS-3.1-1978, Selection and Training of Nuclear Power Plant Personnel
- (f) Letter from H. R. Denton, Director, NRR, to All Power Reactor Applicants and Licensees, Subject: Qualifications of Reactor Operators dated March 28, 1980

The inspector reviewed the licensee requalification training program required by references (a) through (f) to verify that the program had been established in accordance with regulatory requirements, industry guides and standards, and Technical Specifications. The following criteria were used during this review to determine the overall acceptability of the established program:

- Determination that changes to the requalification training program were in conformance with NRC requirements.
- Documentation that required procedure reviews were performed.
- Lesson plans were prepared for subject matter presented during requalification training.
- Determination that all aspects of the requalification program were being adequately addressed.

The following documents were reviewed to verify that previously listed criteria had been incorporated into licensee requalification training activities:

Licensed Operator Requalification Program, Dated 12/19/83

TAG 1.1.2, North Anna Training Administrative Guideline, Dated 12/27/83

TAG 6.2.12, Key Control for Training Building Records Vault, Dated 12/30/83

TAG 6.2.13, Records Management for Nuclear Training Records, Dated 12/30/83

ADM-2.17, Requalification Program for Nuclear Operators, Dated 3/22/84

The licensee modified the licensed operator requalification program in 1983. In a letter from W. L. Stewart to H. R. Denton dated October 12, 1983, Serial No. 553, the licensee requested an extension to the simulator portion of the licensed operator requalification program. This simulator portion includes reactivity manipulations, operations evaluations, and oral evaluation for licensee personnel in the requalification program. The rationale behind the request was that the site specific simulator was due for

completed installation in December 1983. The performance of the simulator training on this equipment was preferable to previous methods. The training completion was scheduled for June 1984. A newly revised licensed operator requalification program was submitted to the NRC in a letter from W. L. Stewart to B. A. Wilson dated January 15, 1984, Serial No. 012. These revisions were accepted by the NRC in a letter from J. R. Miller to W. L. Stewart dated March 30, 1984.

The inspector reviewed training records for 14 licensed personnel. These personnel included 6 SROs, 5 ROs, 1 SRO/STA on the training staff, and 2 plant licensed staff personnel. The training records included the following specific areas:

- Review of cycle 1-10 tests for various licensed personnel
- Verification of class attendance for selected licensed personnel
- Verification of reactivity manipulations for selected licensed personnel
- Verification of abnormal and emergency procedure reviews for selected personnel
- Verification of satisfactory grades on annual requalification examinations for selected personnel
- Verification of satisfactory operational evaluations for selected personnel

The licensee does not have a separate STA training program. STAs are required to attend annual licensed operator requalification lectures and take tests associated with these lectures. They are also required to take the annual requalification examination whether or not they have a license.

The inspector reviewed training lesson plans for pressurized thermal shock, primary chemistry, neutron moderation, basic instrumentation and control concepts, and reactor kinetics. The inspector verified that Technical Specification changes 32, 33, 36, 37, 38 and 41 had been incorporated into training for licensed personnel. The inspector verified that design changes DC-81-505B and DC-82-513A had been incorporated into training for licensed personnel. The inspector reviewed training activities Audit N-83-05. This audit was conducted in May and June 1983 and was issued July 5, 1983. The audit identified 11 findings. One item remains outstanding as of the date of the inspection. This finding requires hardware changes on the record vault security system.

The licensee training staff was reorganized in the latter part of 1983. At that time the power Training Services Department was formed. This group established a 5-year training plan in January 1984. The plan addresses training at North Anna, Surry, Power Operations, and an overall program

development and evaluation. Some of the objectives at North Anna include continuing licensed operator requalification training, conducting the STA continuing training program, general employee training, basic systems training, and use of simulator to support training.

Within this area, no violations or deviations were identified.