

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

August 10, 1984

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

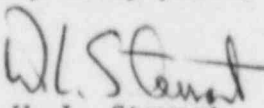
Serial No. 432
NO/JHL:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have received your letter of July 10, 1984, in reference to the inspection conducted at North Anna Power Station between June 18, 1984 and June 22, 1984 and reported in IE Inspection Report Nos. 50-338/84-21 and 50-339/84-21. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report 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,


W. L. Stewart

Attachment

cc: Mr. Richard C. Lewis, Director
Division of Project and Resident Programs

Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing

Mr. M. W. Branch
NRC Resident Inspector
North Anna Power Station

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/84-21 AND 50-339/84-21

NRC COMMENT:

10 CFR 71.5(a) requires that a licensee, who transports licensed material outside the confines of his plant or other place of use, or delivers licensed material for transport, shall comply with the applicable requirements of the Department of Transportation regulations appropriate to the mode of transport of DOT in 49 CFR Parts 170 through 189.

49 CFR 172.202 and 172.203 state the information required to be included in the shipping paper description of radioactive material.

Contrary to the above, radioactive material shipping papers for shipments made on January 2, 1984 (packages labeled Radioactive Yellow II), May 1, 1984 (packages labeled Radioactive Yellow II), May 15, 1984, and June 1, 1984, did not include the radioactive material shipping name, identification number (only the May 15, 1984 shipment indicated the identification number) or, when required for packages labeled Radioactive Yellow II, the transport index.

This is a Severity Level IV violation (Supplement V).

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated with exception to the shipment date. This date should be February 2, 1984 rather than January 2, 1984.

(2) REASON FOR VIOLATION:

This violation is the result of inadequate procedural instructions. The Health Physics procedure did not specifically state all of the information that must be included on shipping documents to ensure compliance with federal regulations. In addition, the existing procedures do not require the notification of the onsite Quality Assurance (QA) group to allow their surveillances to be conducted in all cases. Typically, only station generated material is subject to QA surveillance prior to release.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

A review of existing Health Physics procedures for the packaging, shipment and receipt of radioactive material was conducted. It has been determined that the level of control necessary for radiological shipments, other than normal radwaste shipments, are inadequate. In addition, the requirement for notification of onsite QA personnel is not specifically stated for all shipping situations.

Until these procedural discrepancies can be resolved, an Assistant Health Physics Supervisor responsible for radiological wastes, or his designee, has been assigned to personally verify the accuracy and completeness of shipping documents prior to the transport of any radioactive material from the station. In addition, he will ensure that the QA group be notified prior to any such shipments.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The resolution of the procedural discrepancies noted as a result of the review should preclude further violations. The procedure revisions will include provisions for specific guidance and criteria for handling radioactive material and the administrative guidance for document accuracy and QA notification.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The development of the new procedure will be completed by September 1, 1984.