

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 8, 1992

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

Serial No. 92-425
NAPS/JHL
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
INSPECTION REPORT NOS. 50-338/92-13 AND 50-339/92-13
RESPONSE TO THE NOTICE OF VIOLATION

We have reviewed your letter of June 12, 1992, which referred to the inspection conducted at North Anna Power Station from April 19, 1992, through May 16, 1992, and reported in Inspection Report Nos. 50-338/92-13 and 50-339/92-13. The letter also transmitted a Notice of Violation that was identified during the inspection. Our response to the Notice of Violation is attached.

In your letter that transmitted the Notice of Violation, you expressed concern over the deviations from the nuclear plant staff working hour limits that were inappropriately authorized on a routine basis for outages and emergency plan coverage. The basis for your concern was that routinely exceeding overtime limits could lead to significant reductions in the effectiveness of personnel due to fatigue. We are in agreement that this issue requires additional attention.

To resolve the issue, Virginia Power Administrative Procedure VPAP-0103, Working Hours and Limitations, was revised to clarify the Station Manager's responsibilities for authorizing overtime and to provide guidance on what is intended by the term "unusual circumstance" that would permit management to authorize personnel overtime above the established limits. A memorandum from the Station Manager was distributed to all station personnel that emphasized the overtime limitations of VPAP-0103 and management's expectations for procedure compliance. In addition, appropriate measures have been taken to ensure that maintenance personnel

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providing Emergency Plan Implementing Procedure coverage do not exceed the overtime requirements specified in VPAP-0103.

if you have any further questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

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

RESPONSE TO THE NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/92-13 AND 50-339/92-13

NRC COMMENT

During an NRC inspection conducted on April 19 - May 16, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1991), the violation is listed below:

Technical Specification Table 6.2-1 requires that procedures will be established to insure that NRC policy statement guidelines regarding working hours established for employees are followed.

Generic Letter 82-12, Nuclear Power Plant Staff Working Hours, establishes NRC policy statement guidelines on overtime limits, one of which is 72 hours in any seven day period and that deviation from the guidelines may be authorized under very unusual circumstances.

Contrary to the above, VPAP-0103, Working Hours and Limitations, failed to adequately insure that the NRC policy statement guidelines were followed in that personnel routinely, and on a widespread basis, exceeded 72 hours in seven day periods for conducting outage activities and maintaining emergency plan standby coverage.

This is a Severity Level IV Violation (Supplement I).

RESPONSE TO THE NOTICE OF VIOLATION

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by an improper management interpretation of requirements for allowed overtime. In addition, Virginia Power Administrative Procedure VPAP-0103, Working Hours and Limitations, did not adequately define an unusual circumstance that would allow approval for exceeding overtime limits. Therefore, management interpreted an unusual circumstance as including a refueling outage and Emergency Plan Implementing Procedure (EPIP) coverage. Based on this interpretation, management authorized personnel to exceed the 72 hour in a 7 day period overtime limit allowed by NRC Generic Letter 82-12.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Virginia Power Administrative Procedure VPAP-0103, Working Hours and Limitations, was revised to clarify the Station Manager's responsibilities for authorizing overtime and provide guidance on what is intended by the term "unusual circumstance" that would permit management to authorize personnel overtime above the established overtime limits.

A memorandum from the Station Manager to all station personnel, dated June 16, 1992, discussed the limitations on the hours of work at the plant, clarified the description of an unusual circumstance, emphasized the need to obtain approval prior to exceeding overtime limitations, and discussed the supervisory responsibilities for monitoring the overtime hours worked by staff employees.

Appropriate measures have been taken to ensure that maintenance personnel providing Emergency Plan Implementing Procedure coverage do not exceed the overtime requirements specified in VPAP-0103.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No further corrective actions are required.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.