

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

December 12, 1984

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

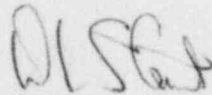
Serial No. 690
NO/JHL:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of November 13, 1984 in reference to the inspection conducted at North Anna Power Station between October 9, 1984 and October 17, 1984 and reported in IE Inspection Report Nos. 50-338/84-37 and 50-339/84-37. 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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Q PDR

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM OCTOBER 9 TO 17, 1984
INSPECTION REPORT 50-338/84-37 AND 50-339/84-37

NRC COMMENT:

Technical Specification 6.5.7.6.a requires that the SNSOC review periodic test procedures.

The accepted QA program, Section 5.3.2 requires that procedure revisions be reviewed.

Contrary to the above, adequate reviews of two periodic tests were not performed since the tests were issued and performed with certain steps in error, specifically 1-PT-94.7 (Revision 1, steps 4.12, 4.19.1, and 4.19.2) and 1-PT-94.5 (Revision 1, step 1.1)

This is a Severity Level V violation (Supplement 1).

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

This violation is correct as stated.

2. REASONS FOR THE VIOLATION

The procedure review and approval process requires that the new or revised procedure be submitted in draft form for safety reviews and approved by the Station Nuclear Safety and Operating Committee. When approved, the procedure goes through a typing and proofreading process until issued in its final form. The reviews conducted during the typing and proofreading process, to ensure that the final product was the same as the approved draft and that the errors were corrected, was not adequate.

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

The errors that were noted in the inspection report were corrected by revising the procedures. In addition, the procedures in question were reviewed to ensure that errors that could obscure or confuse the intent and purpose of the procedure did not exist.

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

In order to strengthen the procedure review process, more explicit direction to reviewers will be provided in the processing procedure for new and revised procedures and in the procedure that governs the periodic review program for all station procedures. Supervisors will be reinstructed on the importance of the final review process.

In addition, the administrative controls placed on the development and review of station procedures to ensure accuracy are being evaluated. These control programs will be revised as necessary to strengthen and improve station procedures.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The revisions to the procedures identified in paragraph 4 will be completed by March 1, 1985.

The evaluation of the administrative controls will be completed by February 1, 1985 and any further corrective actions required will be implemented by March 1, 1985.