

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 3, 1984

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 98-639
NAPS/JHL R1
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
CLARIFICATION OF RESPONSE TO NOTICE OF VIOLATION DOCUMENTED
IN NRC INSPECTION REPORT NOS. 50-338/84-30 AND 50-339/84-30

NRC Inspection Report Nos. 50-338/84-30 and 50-339/84-30, dated October 9, 1984, included a violation for authorizing and subsequently performing an unanalyzed modification that involved painting approximately 8000 square feet of containment ring ventilation duct per unit with non-DBA qualified coating. Virginia Electric and Power Company (Virginia Power) responded to the Notice of Violation by letter dated November 8, 1984 (Serial No. 609). One of the corrective actions in the response stated "An evaluation of the QC Inspector training program for coatings has been completed. It has been decided that the National Association of Corrosion Engineers (NACE) inspectors certification program will be the basic element in the QC inspector training program for coatings. Four experienced coating inspectors have been enrolled in the NACE certification program to be completed in January 1985. The NACE recertification program will also be used to maintain the proficiency of coating inspectors." The purpose of this letter is to clarify our previous violation response. Specifically, the statements in the violation response requiring clarification are:

- 1) The NACE inspectors certification program being the basic element in the QC inspector training program
- 2) Four coating inspectors have been enrolled in the NACE certification program in January 1985, and
- 3) The use of the NACE re-certification program being used to maintain the proficiency of coating inspectors.

First, Virginia Power QC inspector training program for coatings includes selected basic elements of the NACE certification program. Segments of the NACE certification that are not included are not relevant to Virginia Power's nuclear safety-related coatings program. The basic elements of the Virginia Power QC inspector certification training program for coatings include:

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- 1) Storage of Coating Materials
- 2) Surface Preparation
- 3) Environmental Conditions
- 4) Mixing of Materials
- 5) Application Processes
- 6) Coatings Thickness Measurements
- 7) Coating and Blasting Qualification and Coatings Documentation

These basic elements provide the inspector with the specific coating knowledge that ensures in-containment coatings are properly stored, applied, and documented.

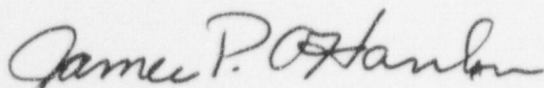
Second, four coating inspectors successfully completed the NACE certification program in 1985. These individuals played a vital role in developing our present coatings inspection program. However, it was not intended to maintain four NACE certified inspectors indefinitely. Currently, there is one NACE certified inspector at North Anna. Other coatings inspectors have successfully completed the Virginia Power QC inspector training program, which presently serves as the continuing basis for inspector qualification.

Finally, the Virginia Power QC inspectors training program currently applies the requirements of American National Standards Institute (ANSI) N-45.2.6, Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants to re-certify coatings inspectors. ANSI N-45.2.6 requires job performance be re-evaluated at periodic intervals not to exceed three years. Re-evaluation is by continued satisfactory performance.

The clarification to this violation response does not decrease commitments made in the response to the Notice of Violation or decrease the effectiveness of the Virginia Power QC inspectors training program for coatings.

If you have any questions, please contact us.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

Commitments made by this letter: None

cc: U.S. Nuclear Regulatory Commission
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Mr. M.J. Morgan
NRC Senior Resident Inspector
North Anna Power Station