

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

July 17, 1987

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

Serial No. 87-388  
NAPS/JHL  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

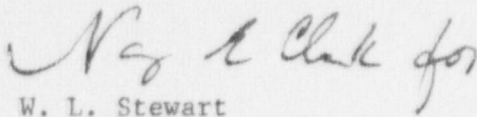
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2  
NRC INSPECTION REPORT NOS. 50-338/87-09 AND 50-339/87-09

We have reviewed your letter of June 17, 1987 which referred to the inspection conducted at North Anna on May 18 and May 20-22, 1987 and reported in Inspection Report Nos. 50-338/87-09 and 50-339/87-09. The response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public record. If you have any further questions, please contact us.

Very truly yours,

  
W. L. Stewart

Attachment

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

Mr. J. L. Caldwell  
NRC Senior Resident Inspector  
North Anna Power Station

ATTACHMENT

RESPONSE TO THE NOTICE OF VIOLATION REPORTED DURING THE  
NRC INSPECTION CONDUCTED ON MAY 18 AND MAY 20 - 22, 1987  
INSPECTION REPORT NOS. 50-338/87-09 AND 50-339/87-09

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 18 and May 20-21, 1987, violations of NRC requirements were identified. The violation involved the failure to establish and maintain an adequate material control and accounting procedure which resulted in a failure to conduct an annual physical inventory of all special nuclear material. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

10 CFR 70.51(c) requires that each licensee who is authorized to possess at any one time special nuclear material in a quantity exceeding one effective kilogram of special nuclear material to establish and maintain written material control and accounting procedures which are sufficient to enable the licensee to account for the special nuclear material in his possession under license.

10 CFR 70.51(d) requires that each licensee who is authorized to possess at any one time and location special nuclear material in a quantity totalling more than 350 grams of contained U-235 to conduct a physical inventory of all SNM in his possession under the license at intervals not to exceed twelve months.

Contrary to the above, the licensee's administrative procedure No. ADM-19.24 was inadequate in that it did not address the fundamental elements of material control in the area of storage, inventory, and internal transfers of all special nuclear material (SNM) including incore and excore detectors which resulted in a failure to conduct an annual physical inventory of SNM incore detectors and excore detectors.

This is a Severity Level IV (Supplement III).

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated. As described in the Inspection Report, however, material accountability and control was determined to be adequate.



2. REASON FOR THE VIOLATION:

Administrative (ADM) procedure (19.24) for physical inventory and item control of special nuclear material (SNM) addresses new and spent fuel. This procedure was inadequate because we failed to recognize that a physical inventory was required for detectors containing very small amounts of SNM.

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

A new administrative procedure has been approved which will require performance of a semiannual physical inventory of the incore and excore detectors containing SNM. This procedure includes a physical inventory of those detectors containing SNM that are currently in use, in storage, in stock, receipted, or have been shipped offsite.

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

The initial physical inventory of incore and excore detectors containing SNM will be performed by September 30, 1987. Future physical inventories of incore and excore detectors containing SNM will be performed on a semi-annual basis.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by September 30, 1987.