10 CFR 2.201

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

August 26, 1987

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

Serial No. 87-459
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. 50-338/87-12 AND 50-339/87-12

We have reviewed your letter of July 21, 1987 which referred to the inspection conducted at North Anna between May 4 - 8, 18 - 22, and June 3 - 5, 1987 and reported in Inspection Report Nos. 50-338/87-12 and 50-339/87-12. As agreed with Mr. R. Croteau of your staff during a telephone communication on August 21, 1987, this response was delayed to no later than August 27, 1987. 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

IE01
1/1

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 BETWEEN MAY 4 - 8, 18 - 22, AND JUNE 3 - 5, 1987 INSPECTION REPORT NOS. 50-338/87-12 AND 50-339/87-12

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 4 - 8, 18 - 22, and June 3 - 5, 1987, a violation of NRC requirements was identified. The violation involved a failure to maintain control of safety related materials as required by approved site procedures and regulatory request. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

> 10 CFR 50, Appendix B, Criterion V, as implemented by the Virginia Electric and Power Company QA Topical Report (VEP-1-4A), requires that the activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.
>
> Administrative Procedures ADM-8.0, paragraph requires that safety-related material stored in a designated "Safety-Related (SR) Field Storage Area" if not being worked, fabriacted or installed; also, ADM-9.4 requires that all unused electrodes or bare welding rods,.... must be returned to the welding foreman.... upon completion of the job or shift. Strict accountability must be maintained.
>
> Contrary to the above, on May 20, 1987, control over safety-related materials including welding consummables, was not being maintained in that a substantial amount of unused 308L 3/32 "d, Heat #C53271 stainless steel filler metal wire and three 3/4" d class 1 globe valves 1-SI-189, 1-SI-27 and 1-SI-272 had been left unattended overnight on the ground level inside "C" cubicle.
>
> This is a Severity Level IV violation (Supplement I) and applies only Unit 1.

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

2. REASON FOR THE VIOLATION:

The violation was caused by personnel failing to designate or create a Safety Related Field Storage Area for the implementation of Engineering Work Request (EWR) 87-365 which replaced drain valves in the Unit 1 safety injection system.

The replacement of the drain valves in the safety injection system was originally scheduled to be completed within one day. Since the piping took longer to drain than expected, the job could not be completed within the scheduled timeframe. The valves and welding material were kept in the basement of the containment for several days, until the piping was completely drained, before welding the valves into the safety injection system.

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

At the time the NRC Inspector identified the discrepancy, on May 20, 1987, the installation of the valves was being completed. There was no need to create a Safety Related Field Storage Area at this time. The condition of the welding materials and valves used during the job, even though they were not stored in a Safety Related Field Storage Area, was satisfactory. The bare welding wire (stainless steel wire) was sealed in a bag to prevent corrosion, and the valve assemblies were capped until they were installed. In addition, the welding materials and valves were inspected by the craft prior to installation and found acceptable for use (i.e. the materials were not damaged and were traceable to purchase documentation). After the valves were installed, the welds were inspected visually by QC and a dye penetrant test was performed to verify that the welds were acceptable.

The welding foreman and work crew for the job were instructed on the proper storage requirements for category 1 materials that are required at a jobsite.

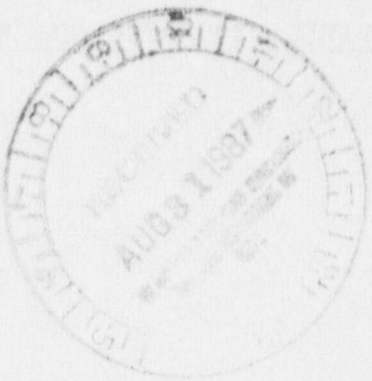
Welding crews were instructed, on August 11, 1987, on the proper storage requirements of category 1 materials that are required at a jobsite. The procedural requirements of ADM-8.0 , ADM-9.6, and ADM-13.4 were addressed.

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

The appropriate welding procedures will be revised to require the creation of a Safety Related Field Storage Area if a job is not completed during one shift or if materials will be left unattended.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The revision to the appropriate welding procedures will be completed by September 30, 1987.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