

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
SENIOR VICE PRESIDENT
POWER

July 10, 1989

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

Serial No. 89-449
NAPS/DEQ
Docket No. 50-338
50-339
License No. NPF-4
NPF-7

Gentlemen:

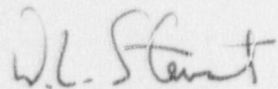
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/89-18 AND 50-339/89-18
REPLY TO THE NOTICE OF VIOLATION

We have reviewed your letter of June 9, 1989 which referred to the inspection conducted at North Anna on May 15, 1989 through May 19, 1989 and reported in Inspection Report Nos. 50-338/89-18 and 50-339/89-18. Our responses to the Notices of Violation are attached.

We have no objection to this correspondence being made matter of public record.

If you have any further questions, please contact us.

Very truly yours,


W. L. STEWART

Attachments:

IE01
11

8907180044 890710
PDR AD0CK 05000338
Q PNU

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

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

RESPONSE TO THE NOTICES OF VIOLATION
REPORTED DURING THE NRC INSPECTION CONDUCTED
BETWEEN MAY 15, 1989 AND MAY 19, 1989

INSPECTION REPORT NOS 50-338/89-18 AND 50-339/89-18

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 15 -19, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion V as implemented by the Virginia Electric and Power Company QA Topical Report (VEP-1-4A) requires in-part that, activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Virginia Electric Power Company's Radiographic Examination Procedure No. NDE-RT-101, Rev. 0, Paragraph 2.1.3 states that a system shall be used to produce permanent identification on the radiograph traceable to the Contract Component, weld or weld seam or part numbers. Addendum A, paragraph A.2 states that welds that are shown by radiography to have incomplete fusion are unacceptable.

Contrary to the above, on May 16, 1989, seven film packages for welds in the Feedwater System had incorrect line identification permanently radiographed on the films. In addition, approximately 1 1/2 inches of incomplete fusion in the weld at break point 851 had not been rejected by the licensee in accordance with the approved procedure.

This is a Severity Level IV violation (Supplement I-D).

- B. 10 CFR 50, Appendix B, Criterion V as implemented by the Virginia Electric and Power Company QA Topical Report (VEP-1-4A) requires in-part that, activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures. Relative to fire protection, these requirements are implemented, by the North Anna Fire Protection Manual "Fire Protection Program" Section 3.5.7 which states, in part, that a firewatch shall be required during any work involving ignition sources when the work is performed in a safety-related area.

Contrary to the above, on May 17, 1989, activities were not accomplished in accordance with the above, in that an employee assigned a firewatch duty was observed, by NRC, to be sleeping on duty in the Unit 1 containment building, while welding was in process. This individual was working to Work Order 88-11, under Radiation Work Permit 1885.

This is a Severity Level IV violation (Supplement I-D).

VIOLATION A

NRC COMMENT

- A. 10 CFR 50, Appendix B, Criterion V as implemented by the Virginia Electric and Power Company QA Topical Report (VEP-1-4A) requires in-part that, activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Virginia Electric Power Company's Radiographic Examination Procedure No. NDE-RT-101, Rev. 0, Paragraph 2.1.3 states that a system shall be used to produce permanent identification on the radiograph traceable to the Contract Component, weld or weld seam or part numbers. Addendum A, paragraph A.2 states that welds that are shown by radiography to have incomplete fusion are unacceptable.

Contrary to the above, on May 16, 1989, seven film packages for welds in the Feedwater System had incorrect line identification permanently radiographed on the films. In addition, approximately 1 1/2 inches of incomplete fusion in the weld at break point 851 had not been rejected by the licensee in accordance with the approved procedure.

This is a Severity Level IV Violation (Supplement i-D).

RESPONSE TO VIOLATION A

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by Virginia Power and contract personnel error. The radiographer put the wrong line identification on seven Feedwater System radiographs. Subsequent inspections by Virginia Power and contract radiograph interpreters failed to detect this error. The Virginia Power and contract radiograph interpreters also failed to detect the area of incomplete fusion in the weld at break point 851.

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

The line identification was corrected on the seven Feedwater System radiographs. Also, the remaining Feedwater System break point locations were reviewed by the Virginia Power Corporate NDE Level III and no additional problems were identified.

The area of incomplete fusion in the weld at break point 851 was rejected and submitted for repair.

RESPONSE TO VIOLATION A

(continued)

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

Contract radiograph interpreters will be qualified in accordance with a Virginia Power documented qualification program which will include practical examinations.

NDE-RT-101 will be revised to include a radiograph interpretation checklist. The checklist will be used by Virginia Power radiograph interpreters to ensure that adequate time is taken for consideration of important technique parameters and to ensure the radiograph interpreters properly review the radiographs

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The qualification program will be implemented by August 1, 1989.

The radiograph interpretation checklist will be incorporated into NDE-RT-101 by August 1, 1989.

VIOLATION B

NRC COMMENT

B. 10 CFR 50, Appendix B, Criterion V as implemented by the Virginia Electric and Power Company QA Topical Report (VEP-1-4A) requires in-part that, activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures. Relative to fire protection, these requirements are implemented, by the North Anna Fire Protection Manual "Fire Protection Program" Section 3.5.7 which states, in part, that a firewatch shall be required during any work involving ignition sources when the work is performed in a safety-related area.

Contrary to the above, on May 17, 1989, activities were not accomplished in accordance with the above, in that an employee assigned a firewatch duty was observed, by NRC, to be sleeping on duty in the Unit 1 containment building, while welding was in process. This individual was working to Work Order 88-11, under Radiation Work Permit 1885.

This is a Severity Level IV violation (Supplement I-D).

RESPONSE TO VIOLATION B

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 error and inadequate procedure. The employee had been instructed on the duties of a firewatch but, failed to properly perform those duties. The procedure failed to require the firewatch to continuously walk and observe all affected areas.

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

The employee was immediately removed from the site and terminated. The foreman of the employee was questioned to determine if he was aware of any of his employees sleeping. The foreman was not aware of any of his personnel sleeping and was aware that sleeping is not allowed onsite by any employee in any capacity.

The Nuclear Site Services work procedure #WP 001, "Welding and Flame Permits", was revised to: 1) require the foreman to instruct the firewatch prior to starting a job, 2) require continuous walking and observing of all affected areas, and 3) add cautions to remain alert and observant.

This incident has been reviewed with the Nuclear Site Services contract employees. The importance of firewatches and attentiveness of supervision was stressed.

RESPONSE TO VIOLATION B

(continued)

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

No additional corrective actions are necessary to avoid further violations.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.