

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

73 APR 23 A 9:11

April 20, 1979

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Serial No. 211  
PO/FHT:scj  
Docket No. 50-280  
50-281

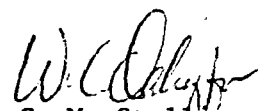
License No. DPR-32  
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of March 28, 1979, in reference to the inspection conducted at Surry Power Station on February 12-16, 1979, and reported in I.E. Inspection Report No. 50-280/79-9, 50-281/79-10. Our response to the specific violations are attached.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure.

Very truly yours,

  
C. M. Stallings  
Vice President-Power Supply  
and Production Operations

Attachment

cc: Mr. Albert Schwencer

ccp

7906200143

790199

OFFICIAL COPY

RESPONSE TO VIOLATIONS LISTED  
IN IE INSPECTION REPORT  
50-280/79-9, 50-281/79-10

A. NRC COMMENT

As required by Technical Specification 3.4.A.2, the Recirculation Spray Subsystems shall be operable during reactor operation. Section 6.3.1 of the FSAR describes two stages of screen assemblies, which surround the sump from which the containment recirculation spray pumps take suction. The first stage is a trash rack and roughing screen. The second stage consists of cylindrical screens of fine mesh over each suction point.

Contrary to the above, on February 15, 1979, inside the Unit 1 Containment with the reactor at 100% power, a portion of the trash rack was found removed and incapable of performing its intended function. All other screens were in place.

RESPONSE

The item is correct as stated.

1. Corrective steps which have been taken and results achieved:

A containment entry was made February 15, 1979, to install the loose grate and insure all other screens were in place. Containment entries were made on February 15 and 16, 1979, for a clean-up and to insure no loose material was present in the area of the screens.

Start-up Check Sheet, OP-1B, has a sign-off step to insure screens are in place and clear of debris. A memo was promulgated to Department Heads on March 1, 1979 to reiterate the requirement that the grating be reinstalled and all work material be removed from the containment basement after job completion.

2. Corrective steps which will be taken to avoid further non-compliance:

The action taken above will preclude further non-compliance.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

B. NRC Comment

As required by Technical Specification 6.4.B.1.b, the entrance to each radiation area in which the intensity of radiation is equal to or greater than 1 rem/hr shall be provided with locked barricades to prevent unauthorized entry into these areas.

Contrary to the above:

1. On February 14, 1979, a trap door providing access to a pipe chase between the fuel and decontamination buildings on the 6'10" elevation was unlocked. General area radiation levels as high as 15 rem/hr were measured by an NRC inspector and a licensee health physics technician in the pipe chase. The pipe chase provided access to the top of the spent resin catch tank. The ladder to the top of this tank was posted indicating radiation levels of 1000 rem/hr.
2. On February 13, 1979, Gate No. 8 on the 2' elevation of the Auxiliary Building was unlocked. The gate provided access to general area radiation levels of 1.1 to 2.0 rem/hr, as measured by an NRC inspector and a licensee health physics technician near piping underneath the primary drains tank.
3. On February 13, 1979, a gate providing access to the boric acid filters at the 13' elevation in the Auxiliary Building was unlocked. General area radiation levels of 0.1 to 2.0 rem/hr were measured by an NRC inspector and a licensee health physics technician near the boric acid filters.

B. Response

The above infraction is correct as stated.

1. Corrective steps taken and the results achieved:

All of the barricades indicated above were locked by Health Physics personnel.

2. Corrective steps which will be taken to avoid further non-compliance:

The Station Manager has conducted retraining sessions for station personnel in regard to access to high radiation areas greater than 1 rem/hr. New administrative control of access and egress from locked high radiation areas has been implemented which requires a buddy system and dual signing for keys to radiation areas in excess of 1 rem/hr.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

### C. NRC Comment

As required by Technical Specification 6.4.B.1.a, the entrance to each radiation area in which the intensity of radiation is greater than 0.1 rem/hr but less than 1.0 rem/hr shall be barricaded and conspicuously posted.

Contrary to the above:

1. On February 14, 1979, the trap door providing access to a pipe chase between the fuel and decon buildings, on the 6'10" elevation, was not posted as a high radiation area. General area radiation levels from 0.1 to 15 rem/hr were measured by an NRC inspector and a licensee health physics technician. (This is the same area noted as unlocked in Item B.1.)
2. On February 13, 1979, a high radiation area near a lead shielded shovel on the floor at elevation 6'10" in the decon building was not posted or barricaded. The general area radiation level as measured by the NRC and a licensee's health physics technician was 0.3 rem/hr in areas accessible to individuals.
3. On February 13, 1979, a high radiation area near the boric acid filter at the 13' level in the Auxiliary Building was not posted or barricaded. The radiation levels as measured by an NRC inspector and a licensee health physics technician were 0.1 to 2.0 rem/hr in areas accessible to individuals near the filter. (This is the same area noted as unlocked in item B.3).
4. On February 12, 1979, a high radiation area around the boric acid tanks on the 27' level as measured by an NRC inspector, and as posted on a sign in the area by the licensee, was 0.12 rem/hr in areas accessible to individuals.

### C. Response

The above infraction is correct as stated

#### 1. Corrective steps taken and results achieved:

The areas identified in the inspection report have been surveyed and posted and/or barricaded as required.

#### 2. Corrective steps which will be taken to avoid further non-compliance:

Existing procedures require that radiation areas be posted and/or barricaded. Health physics personnel have been re-instructed on the necessity to follow the procedures.

#### 3. The date when full compliance will be achieved:

Full compliance has been achieved.

D. NRC Comment

As required by Technical Specification 6.4.A.7, detailed written procedures shall be provided for preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

Contrary to the above, on February 13, 1979, 1000 to 1500 pounds of temporary lead shielding were strapped to a five foot section of the residual heat removal (RHR) system. At the time, the reactor (Unit #2) was being defueled and approximately 1/2 the core was still in the vessel. The RHR system was being used for decay heat removal. No procedure addressing installation of this shielding had been developed.

D. Response

This item is correct as stated.

1. Corrective steps which have been taken and results achieved:

The lead was removed from the RHR system. An analysis was performed which concluded that a pipe stress problem did not exist either statically or would not have existed during a D.B.E.

2. Corrective steps which will be taken to avoid further noncompliance:

The steam generator replacement group has been instructed that an analysis must be performed prior to shielding.

3. The date when full compliance will be achieved:

Full compliance has been achieved.

E. NRC Comment

As required by 10CFR20.203(f)(1) and 20.203(f)(2), each container of licensed material containing quantities greater than those listed in Appendix C of 10 CFR 20 shall bear a durable, clearly visible label identifying the radioactive contents and bear the radiation caution symbol described in 10 CFR 20.203(a) and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL." 10 CFR 20.203 (f) (3) specifies exceptions to the labeling requirements of 10 CFR 20.203(f)(1) and 20.203(f)(2).

Contrary to the above, on February 12 and 13, 1979 twelve 55-gallon drums in the Auxiliary Building containing contaminated materials were not labeled as stated above. Assuming typical activation products, and drums contained activities ranging from 200 to 16,000 times 10 CFR 20 Appendix C activities. The exceptions specified by 10 CFR 20.203(f)(3) did not apply.

E. Response

The above infraction is correct as stated.

1. Corrective steps taken and the results achieved:

The containers mentioned in the report were stenciled with the appropriate labels as required.

2. Corrective steps which will be taken to avoid further non-compliance:

Health Physics personnel have been re-instructed on the necessity of labeling drums containing radioactive materials.

3. The date when full compliance will be achieved.

Full compliance has been achieved.

7

F. NRC Comment

As required by 10 CFR 20.203(d)(2), each airborne radioactivity area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol described in 10 CFR 20.203(a) and the words "CAUTION, AIRBORNE RADIOACTIVITY AREA." 10 CFR 20.203(d)(1)(i) defines an airborne radioactivity area as any room, enclosure, or operating area in which airborne radioactive materials exist, in concentrations in excess of the amounts specified in Appendix B, Table I, Column 1, of 10 CFR 20.

Contrary to the above, on February 15, 1979, the Unit 1 Containment was not conspicuously posted with a sign bearing the words "CAUTION, AIRBORNE RADIOACTIVITY AREA." The concentration of xenon-133 in Unit 1 Containment on February 15, 1979, was 53 times the concentration listed in Appendix B, Table I, Column 1 of 10 CFR 20.

F. Response

The above infraction is correct as stated.

1. Corrective steps taken and the results achieved:

The Unit 1 Containment was conspicuously posted as required.

2. Corrective steps which will be taken to avoid further non-compliance:

Health Physics personnel will increase their surveillance to ensure compliance.

3. The date when full compliance has been achieved:

Full compliance has been achieved.