

APPENDIX B
NOTICE OF DEVIATION

Virginia Electric and Power Company

License No. DPR-37

Based on the results of the NRC inspection conducted on March 20-23, 1979, certain of your activities appear to deviate from your commitments to the Commission, as indicated below.

- A. Table 6-1 of the "Steam Generator Replacement Program Manual" lists specific measures implemented to maintain radiation doses as low as reasonably achievable including:
1. Establishing low radiation zones in containment for personnel to use for rest breaks.
 2. Minimizing the streaming of radiation by installing shielding such as plugs in open-ended pipe lines following cutting.
 3. Performing preoperational briefings to instruct personnel of the requirements of a work package.
 4. Assuring that the number of persons who must enter high radiation areas or contaminated areas be held to a minimum, that the period of time persons must remain in these areas be minimized and that the magnitude of the potential dose be maintained to the lowest levels commensurate with other considerations.
 5. Keeping zones with high dose rates as small as possible considering the work requirements.

Contrary to the above,

1. On March 21, 1979, two to six individuals waited in 5 to 50 mrem/hour zones for up to four hours awaiting the use of the polar crane to move reactor coolant piping into an electrolysis tank. They stayed in this area because they were told that the crane would be available within thirty minutes all morning long.
2. The shield plugs of a section of reactor coolant piping, were removed at approximately 0300 on March 21, 1979, but the pipe could not be placed in the electrolysis tank until approximately 1500 on March 21, 1979. The premature removal of the shield plugs resulted in radiation levels of 10 rem/hr at the open end of the pipe and 50

7907260607

MAY 18 1979

Virginia Electric and Power Company
License No. DPR-37

-2-

Appendix B
Notice of Deviation

mrem/hr 10 feet away. The cart on which the pipe was stored had to be moved by hand approximately 40 feet after the shielding was removed.

3. On March 21, 1979, three workers were told to report to the basement of containment to await instruction concerning their assignment. The workers waited in an area with radiation levels of 5 to 10 mrem/hr for approximately 30 minutes before being briefed as to the specifics of the work package.
4. On March 22, 1979, three workers spent at least two hours searching containment in 5 to 50 mrem/hour fields, attempting to locate fittings for pipe which they were to run.
5. From March 20 - 23, 1979, from one to six individuals frequently waited for 5 to 15 minutes in radiation fields 10 to 20 mrem/hour outside C cubicle near the RHR platform. A low-dose area was approximately fifty feet down the corridor.