

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

September 4, 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. 676  
PO/DLB:scj  
Docket No. 50-281  
License No. DPR-37

Dear Mr. O'Reilly:

This is in response to your letter of August 15, 1979, regarding a special inspection conducted on April 15-19, 1979. Our response to Appendix A of your letter, pursuant to 10CFR2.201, is attached. Our response to Appendix B, pursuant to 10CFR2.205, a copy of which is also enclosed, has been forwarded to Mr. Victor Stello, Jr.

As explained in our response to Appendix B, since this was an isolated act by a single employee who disregarded well-established station procedures, we do not consider it indicative of inadequacies in station procedures or controls. Nonetheless, as explained in the attached response to Appendix A, Vepco has taken actions to reinforce existing health physics administrative controls on access to radiation areas.

Very truly yours,

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

Attachment  
Enclosure

**REGULATORY DOCKET FILE COPY**

cc: Mr. Albert Schwencer

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RESPONSE TO IE SPECIAL INSPECTION  
OF APRIL 15-19, 1979

A. NRC COMMENT

10 CFR 20.101(b)(1) requires that the dose to the whole body of any individual in a restricted area shall not exceed 3 rems during any calendar quarter.

Contrary to the above, on April 14, 1979, an employee received a whole body dose of approximately 10 rems during an entry into the incore instrument room.

This violation constituted an occurrence related to health and safety.

(Civil Penalty - \$4,000)

RESPONSE

The above violation is correct as stated.

(1) Reason for Non-Compliance.

An individual violated existing radiological control procedures.

(2) Corrective steps which have been taken and the results achieved:

Proper administrative actions were taken against the individual involved.

(3) Corrective steps which have been taken to avoid further non-compliance:

A service desk manned by a qualified Health Physics Technician has been established in an area leading to the restricted controlled area. Copies of Radiation Work Permits (RWP's), dose rate meters, survey maps and other information is readily available to all personnel. This measure will reinforce existing procedures. A thorough review of the Health Physics Manual and existing administrative procedures required no additional changes.

(4) The date when full compliance will be achieved:

Full compliance has been achieved.

B. NRC COMMENT

Technical Specification 6.4.B.1(i) and 6.4.D require that stringent administrative procedures shall be implemented and followed to assure adherence to the restriction placed on the entrance to a high radiation area and the radiation protection program. Section 1.3.F.4 of the facility Health Physics Manual states that any area posted with a radiation warning placard signifies the existence of a potential hazard and the placard instructions must not be violated. On April 14, 1979, the entrance to the Unit 2

incore instrument room was placarded with the following instruction:  
"High Radiation Area - Prior Health Physics Notification Required for Entry."

Technical Specification 6.4.B.1(g) requires that a radiation work permit system shall be used to authorize and control work performed in high radiation areas. Section 1.3.F.5 of the facility Health Physics Manual requires issuance of a special Radiation Work Permit (RWP) for non-routine jobs or to cover unusual circumstances on a routine job.

Contrary to the above, on April 14, 1979, a worker entered the Unit 2 incore instrument room, a high radiation area, without prior notification of health physics personnel and without issuance of a special RWP to authorize and control this non-routine job. The worker was overexposed to approximately 10 rems during this entry.

This violation contributed to an occurrence related to health and safety.

(Civil Penalty - \$4,000)

#### RESPONSE

The above violation is correct as stated.

(1) Reason for Non-Compliance:

An individual violated existing radiological control procedures.

(2) Corrective steps which have been taken and the results achieved:

Proper administrative actions were taken against the individual involved.

(3) Corrective steps which have been taken to avoid further non-compliance:

A service desk manned by a qualified Health Physics Technician has been established in an area leading to the restricted controlled area. Copies of Radiation Work Permits (RWP's), dose rate meters, survey maps and other information is readily available to all personnel. This measure will reinforce existing procedures. A thorough review of the Health Physics Manual and existing administrative procedures required no additional changes.

(4) The date when full compliance will be achieved:

Full compliance has been achieved.

#### C. NRC COMMENT

10 CFR 20.20(b), requires that each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part. 10 CFR 20.201(a) defines a survey as "an evaluation of the radiation hazards...under a specific set of conditions".

Contrary to the above, a survey adequate to comply with the radiation exposure limits of 10 CFR 20.101 was not made in that a worker entered the Unit 2 incore instrument room on April 14, 1979, and received an

C. NRC COMMENT (CONTINUED)

exposure of approximately 10 rems.

This violation contributed to an occurrence related to health and safety.

(Civil Penalty - \$4,000)

REPOSE

The above violation is correct as stated.

(1) Reason for Non-Compliance:

An individual violated existing radiological control procedures.

(2) Corrective steps which have been taken and the results achieved:

Proper administrative actions were taken against the individual involved.

(3) Corrective steps which have been taken to avoid further non-compliance:

A service desk manned by a qualified Health Physics Technician has been established in an area leading to the restricted controlled area. Copies of Radiation Work Permits (RWP's), dose rate meters, survey maps and other information is readily available to all personnel. This measure will reinforce existing procedures. A thorough review of the Health Physics Manual and existing administrative procedures required no additional changes.

(4) The date when full compliance will be achieved:

Full compliance has been achieved.

D. NRC COMMENT

Technical Specification 6.4.B.1(e) requires that any individual permitted to enter a high radiation area be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.

Contrary to the above, on April 14, 1979, a worker was permitted to enter the Unit 2 incore instrument room, a high radiation area, without the required radiation monitoring device.

This is an infraction.

(Civil Penalty - \$3,000)

RESPONSE

The above infraction is correct as stated.

D. (CONTINUED)

(1) Reason for Non-Compliance:

An individual violated existing radiological control procedures.

(2) Corrective steps which have been taken and the results achieved:

Proper administrative actions were taken against the individual involved.

(3) Corrective steps which have been taken to avoid further non-compliance:

A service desk manned by a qualified Health Physics Technician has been established in an area leading to the restricted controlled area. Copies of Radiation Work Permits (RWP's), dose rate meters, survey maps and other information is readily available to all personnel. This measure will reinforce existing procedures. A thorough review of the Health Physics Manual and existing administrative procedures required no additional changes.

(4) The date when full compliance will be achieved:

Full compliance has been achieved.

E. NRC COMMENT

10 CFR 20.403(b) requires that each licensee shall within 24 hours, notify by telephone and telegraph, mailgram, or facsimile, the Director of the appropriate NRC Regional Office of any incident which may have caused "exposure of the whole body of any individual to 5 rems or more radiation".

Contrary to the above, although telephone notification was completed within 24 hours, written notification of a whole body exposure of approximately 10 rems on April 14, 1979, was not transmitted to the Region II Director until April 17, 1979.

This is a deficiency.

(Civil Penalty - \$0)

RESPONSE

The above deficiency is correct as stated.

(1) Reason for Non-Compliance:

Surry Power Station Technical Specifications require that written reports of this nature be accomplished within one working day. 10 CFR 20.403(b) requires that the Director of the appropriate NRC Regional Office be notified within 24 hours. This apparent conflict contributed to this non-compliance with directives.

E. (CONTINUED)

(2) Corrective steps which have been taken and the results achieved:

Employees involved in classifying and reporting this type of incident have been reinstructed in the disparity between 10 CFR 20 and Surry Power Station Technical Specifications and to insure that 10 CFR 20 be complied with.

(3) Corrective steps which will be taken to avoid further non-compliance:

The action described in paragraph (2), above is adequate to insure avoidance of further non-compliance.

(4) The date when full compliance will be achieved:

Full compliance has been achieved.