

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

February 21, 1980

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

Serial No. 027A
PC/DLB:baw
Docket Nos: 50-280
50-281
License Nos: DPR-32
DPR-37

Dear Mr. O'Feilly:

Subject: Inspection Report Nos: 50-280/79-64 and 50-281/79-84

In our letter of January 13, 1980, we responded to the Notice of Violation included in the subject inspection reports. The inspection reports concluded that the locking mechanism on a gate enclosing a high radiation area was inadequate. In our initial response we stated that we did not agree that the gate was not capable of providing its intended function and that we did not concur with the infraction. As requested by members of your staff in a telephone conversation on January 25, 1980 we have reviewed the entire incident. Our findings and conclusions are as follows.

During the subject inspection, your inspector concluded that it would be possible to open the gate by forcing his head through the gap in the gate and manipulating a release pin on the back of the locking mechanism. This conclusion was based on the inspectors success in opening a gate of similar design by this technique.

The intent of Technical Specification 3.4.B.1.6. is to prevent the inadvertent entry of personnel into a high radiation area. We believe that the existing gate was sufficient to prevent inadvertent entry. We agree with your inspector that it may have been possible to open the gate, if not by the technique specified, certainly by some more forceful means of circumvention. As stated in our previous response, in order to alleviate your concerns we are modifying the subject gate and similar gates to make circumvention more difficult. However, we do not agree that the function of the gate is to prevent the deliberate entry, by circumvention of the locking mechanism, of persons intent upon violating established rules and procedures.

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Mr. James P. O'Reilly

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Since the gate as installed would have prevented an inadvertent entry, we feel we were fully in accordance with the intent of the Technical Specifications. Accordingly, we do not believe an infraction is warranted.

Very truly yours,

C. M. Stallings

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

Attachment

cc: Mr. Albert Schwencer