

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261  
USNRC REGION II  
ATLANTA, GEORGIA

82 JAN 20 A10 : 44  
January 15, 1982

R. H. LEASBURG  
VICE PRESIDENT  
NUCLEAR OPERATIONS

Mr. James P. O'Reilly  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Serial No. 669A  
NO/RMT:acm  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

Pursuant to a request from your staff concerning our response to your letter dated December 1, 1981 which forwarded inspection report nos. 50-280/81-25 and 50-281/81-25, the attached supplemental response is being submitted.

Should you have any questions or require any further information, please contact this office.

Very truly yours,



R. H. Leasburg

Attachment

cc: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

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PDR ADDCK 05000280  
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NRC COMMENTS:

- C. As required by 10 CFR 20.203 (c)(3), the controls established for locked high radiation areas required by Technical Specification 6.4.B.1 shall be established in such a way that no individual will be prevented from leaving a high radiation area.

Contrary to the above: on September 22, 1981, the inspector observed that the door to the Unit 1 seal water filter room was locked closed with a chain and padlock. No provision was made in the controls established by the licensee (approved key control procedures) to ensure individuals entering such an area were provided continuous opportunity for egress.

This is a Severity Level VI Violation (Supplement IV.F).

SUPPLEMENTAL RESPONSE:

1. The violation is denied.

As stated in our original response dated December 31, 1981, the Administrative controls established by the station for high radiation areas provide full compliance with Technical Specifications and 10CFR20 requirements. The compensatory measure required to maintain proper administrative control of the Unit 1 seal water filter room (i.e. the chain and padlock), resulted in no increased potential for preventing egress from the area due to several facts. First, individuals entering the area must have a key to gain access. For convenience, such keys are normally attached to the individual's person in some fashion (usually on a string hung about the neck) in order to leave the hands free. The potential for loss of a key is thus minimal. Second, the area in question measures approximately 10 feet by 12 feet and it is unreasonable to assume that individuals entering the area would padlock the gate after entering. Continuous visual surveillance of the gate is possible at all times when in the room. Finally, the "buddy" system employed at the station adds a measure of safety to all entries into high radiation areas by providing an individual to assist or call for help in the event of a problem during such entries. We, therefore, must reassert our contention that the provisions of 10 CFR 20.203 (c) (3) were not violated.