VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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December 31, 1981

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

Dear Mr. O'Reilly:

We have reviewed your letter of December 1, 1981 in reference to the inspection conducted at Surry Power Station between September 21, and September 25, 1981 and reported in IE Inspection Report Nos. 50-280/81-25 and 50-281/81-25. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

R. H. Leasburg

Attachment

City of Richmond
Commonwealth of Virginia
Acknowledged before me this 31st day of Dec., 1981

Ann C. McGee
Notary Public

My Commission expires: 2-26, 1985

SEAL

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

RESPONSE TO NOTICE OF VIOLATION
50-280/81-25 and 50-281/81-25

NRC COMMENTS:

A. As required by Technical Specification 6.4D, procedures prescribed by Specification 6.4.B.1, Health Physics Procedures, must be followed.

1. Health Physics Manual Section 1.3., "Radiation Control Procedures and Policies", Section 1.3.5.B states that a Standing RWP or Special RWP will list the protective measures to be taken and must be followed.

2. Health Physics Manual Section 3.2.2, "Radioactive Gaseous Waste Sampling and Release", section 4.1.4.5 b) states that a tritium sample from the vent-vent is to be obtained by attaching the flow meter and impinger to one of the bypass tees downstream of the sampling pump.

3. Health Physics Manual Section 1.3.1.G.2 requires individuals to survey themselves when leaving a potentially contaminated area. Also, section 1.3.1.G requires individuals who detect contamination to immediately notify Health Physics.

Contrary to the above:

1. On September 21, 1981, RWP 1318 required a full-face respirator be used when putting tools in, or taking them out, of the freon hydrolaze decontamination unit and an individual was observed to not wear a full face respirator while performing this task.

2. On September 23, 1981, the technician sampling the Vent-vent for tritium was observed by the inspector to use a method other than that required by the approved procedure, and this method did not provide a representative sample of tritium concentration.

   On September 23, 1981, the inspector observed also that the approved tritium sampling method was inadequate in that it too would not provide a representative sample.

3. On September 24, 1981, the inspector observed an individual perform self-decontamination without notifying health physics. Subsequent surveys of this person performed after he left the frisking station/portal monitor revealed this individual had inadequately frisked and was still contaminated.

This is a Severity Level V Violation (Supplement IV.E.2).

RESPONSE:

1. The violation is correct as stated.

2. Reasons for the violation:

   (i) violation of the RWP requirements for the freon hydrolaze decontamination unit was the result of personnel error. The individual observed not wearing a full-face respirator as required by the RWP indicated he was aware of the requirement, but forgot to don the equipment.

   (ii) failure to follow the approved procedure for tritium sampling of the vent-vent resulted from personnel error. Additionally, the inadequacy of the procedure to assure a representative sample is recognized.

   (iii) failure to notify Health Physics of personnel contamination and failure to properly frisk resulted from personnel error.

3. The corrective steps taken and results achieved:

   (i) The individual observed violating RWP requirements was verbally reprimanded and informed that any future violations would result in termination of his work assignment at the station. No further violations by this individual have been observed to-date.

   (ii) The technician observed deviating from the approved procedure for tritium sampling of the vent-vent was instructed to review the procedure and ensure proper compliance in the future. The procedure has been evaluated to identify a more adequate sampling method. A minor equipment modification should alleviate the existing inadequacy.

   (iii) The individual observed violating Health Physics requirements regarding monitoring for contamination was reinstructed in the proper technique for frisking and the requirement to notify Health Physics if contamination is found. Additionally, a report of the incident was sent to the individual's supervisor, who indicated that further problems of this nature would result in disciplinary action against the individual.

4. Corrective steps which will be taken to avoid further violations:

   No further corrective steps are deemed necessary with regard to examples (i) and (iii). With regard to example (ii), a minor modification to the sampling system (consisting of installation of a sampling connection downstream of the sample pump) is planned to ensure the tritium sample is extracted from an undiluted sample stream, and is, therefore, representative.

5. Date when full compliance will be achieved

Full compliance has been achieved with regard to examples (i) and (iii) of this violation. Full compliance will be achieved by March 1, 1982 with regard to example (ii).

NRC COMMENTS:

B. As required by 10 CFR 20.203(c), each high radiation area, i.e., greater than 100 millirem per hour whole body exposure, shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION (or DANGER) HIGH RADIATION AREA.

Contrary to the above, on September 22, 1981, dose rates of 200 millirem per hour were present in the vicinity of the process vent filters in the auxiliary building. The affected area was not posted as required.

This is a Severity Level V Violation (Supplement IV.E2).

RESPONSE

1. The violation is correct as stated.

2. Reason for the violation:

The area in the vicinity of the process vent filters, has, in the past, been posted as a precautionary measure since dose rates may vary due to activity build-up on the filters. It is believed that the signs may have been removed during construction activity in the area and were subsequently not replaced.

3. Corrective steps taken and the results achieved:

The area in question was immediately posted as a high radiation area and proper controls established.

4. Corrective steps taken to avoid further violations:

Health Physics technicians have been instructed to verify the posting of all high radiation areas during performance of their normal duties. Particular attention is being given to areas in which heavy construction or maintenance activity has occurred or is in progress.

5. Date when full compliance will be achieved.

Full compliance has been achieved.

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).

RESPONSE:

1. The violation is denied.

Station Administration controls established for high radiation areas provide full compliance with the Tech Specs and 10CFR20 requirements. For the high radiation area in question, a compensatory measure in the form of a chain and padlock was taken to maintain proper administration control. This compensatory measure provided adequate assurance that continuous opportunity for egress from the area existed, as required by 10CFR20. It is our contention that no greater potential for preventing egress from this area was created than existed previously. Therefore, the provisions of 10CFR20.203(c)(3) were not violated.