

June 26, 1985



Dr. J. Nelson Grace  
Regional Administrator  
Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30323

Serial No. 85-429  
NO/HLM:dn  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

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Gentlemen:

We have reviewed your letter of May 29, 1985 in reference to the inspection conducted at Surry Power Station on April 29 - May 2, 1985 and reported in IE Inspection Report Nos. 50-280/85-16 and 50-281/85-16. Our response to the specific violation is attached.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power has no objection to this inspection report 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,

for W. L. Stewart

Attachment

cc: (w/attachment)

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

Mr. D. J. Burke  
NRC Resident Inspector  
Surry Power Station

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RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/85-16 and 50-281/85-16

VIOLATION

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR 50 and the planning standards of 10 CFR 50.47(b). 10 CFR 50.47(b)(10) requires that the licensee's emergency plans include a range of protective actions, consistent with Federal guidance, for the plume exposure pathway EPZ for emergency workers and the public.

The Federal guidance on protective actions to be recommended to offsite officials for a General Emergency is presented in Appendix 1 to NUREG-654/FEMA-REP-1. Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." This guidance is clarified by IE Information Notice No. 83-28, "Criteria for Protective Action Recommendations for General Emergencies." Both of these documents inform the licensee that sheltering of the populace to 2 miles in all directions and 5 miles downwind is to be recommended to offsite authorities promptly upon declaration of a General Emergency.

Contrary to the above, the licensee's emergency plan implementing procedures did not, under some circumstances, provide clear direction to the user to issue a protective action recommendation upon declaration of a General Emergency.

This is a Severity Level IV violation (Supplement VIII).

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

The wording of Surry EPIP-1.05, Step 12, a) created an opportunity for the user not to make an appropriate and immediate Protective Action Recommendation to offsite officials as provided in Step 12, b). The parallel step in North Anna's EPIP-1.05 is worded to require the appropriate Protective Action Recommendation. This difference in wording was not identified during the commonality review due to an oversight.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

EPIP-1.05, Step 12, a) has been reworded to exclude the possibility of the user not making an appropriate and immediate Protective Action Recommendation to offsite officials. The review and approval process for this revision has been completed.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Emphasis will be placed on the change to EPIP-1.05 during retraining.

(5) DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance has been achieved.