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VIRGINIA POWER

August 9, 1985

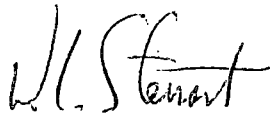
Dr. J. Nelson Grace
Regional Administrator
Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No. 85-175A
NO/JDH:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

On April 3, 1985, we submitted our response to the Notice of Violation in your March 5, 1985 letter (IE Inspection Report Nos. 50-280/85-02 and 50-281/85-02). Based on subsequent discussions with your staff, we are supplementing our response with additional information as discussed in the attachment. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,


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. 50-280/85-02 AND 50-281/85-02

Note: Items 4 and 5 of our response have been revised. The entire response is provided for completeness.

VIOLATION

Technical Specification 6.1.B.1 requires each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. ANSI N18.1-1971, 4.3.2 requires a supervisor to have a minimum of four years of experience in the craft or discipline he supervises. The ANSI standard defines a supervisor as a person principally responsible for directing the actions of operators, technicians or repairman. First line supervisors are included in this category.

Contrary to the above, the minimum qualifications of ANSI N18.1-1971 were not met in that the Supervisor of Health Physics was promoted to his current position with less than four years experience as required.

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

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated, however there are mitigating circumstances which are described below.

(2) REASONS FOR VIOLATION

The violation occurred because, in the judgment of station and corporate management, the fourteen years of nuclear power station experience of the individual appointed as Supervisor of Health Physics more than adequately satisfied the ANSI N18.1-1971 requirement. This experience included six years of supervisory duties, during which he trained Senior Reactor Operators and served as Operations Shift Supervisor. Because of the nature of his duties, particularly as Shift Supervisor, he gained in-depth knowledge of radiological protection and procedures.

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

Even though station management is confident that the Supervisor of Health Physics possesses adequate experience, a survey was conducted to assess the extent of direct health physics experience resident in the organization. It was found that individuals reporting directly to the Supervisor had an average of eight years of nuclear power station experience.

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

We believe that this level of experience within the organization is adequate to provide proper support to the Health Physics Department. Therefore, to correct the discrepancy between the minimum qualifications specified in the ANSI/ANS standard, we are taking the following actions: 1) the Virginia Power QA Topical Report, VEP-1, 4A update, "Quality Assurance Program, Operations Phase", will be modified to include alternative experience criteria for the position of "Supervisors Not Requiring NRC Licenses"; 2) the proposed TS change submitted April 17, 1985 (Serial No. 577A), which revised the standards referenced in Section 6.1.B.1 and identified the new position of Superintendent-Health Physics, will be supplemented to identify that exceptions from the standards are contained in VEP-1.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The revised QA topical report and the supplemental TS change will be submitted to the NRC by September 1, 1985.