

VIRGINIA ELECTRIC AND POWER COMPANY  
 RICHMOND, VIRGINIA 23261

July 17, 1987

W. L. STEWART  
 VICE PRESIDENT  
 NUCLEAR OPERATIONS

U. S. Nuclear Regulatory Commission  
 Attn: Document Control Desk  
 Washington, D.C. 20555

Serial No. 87-389  
 NO/GDM:caa  
 Docket Nos. 50-280  
 50-281  
 License Nos. DPR-32  
 DPR-37

Gentlemen:

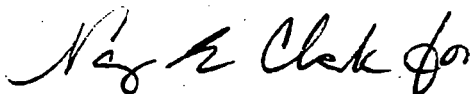
VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNITS 1 AND 2  
NRC INSPECTION REPORT NOS. 50-280/87-10 AND 50-281/87-10

We have reviewed your letter of June 17, 1987, in reference to the inspection conducted at Surry Power Station on May 4-6 and May 18-19, 1987 and reported in Inspection Report Nos. 50-280/87-10 and 50-281/87-10. Our response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart

Attachment

cc: U.S. Nuclear Regulatory Commission  
 Region II  
 101 Marietta Street, N.W.  
 Suite 2900  
 Atlanta, GA 30323

Mr. W. E. Holland  
 NRC Senior Resident Inspector  
 Surry Power Station

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RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED ON MAY 4-6 AND MAY 18-19, 1987  
INSPECTION REPORT NOS. 50-280/87-10 AND 50-281/87-10

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 4-6 and May 18-19, 1987, violations of NRC requirements were identified. The violation involved a failure to establish and maintain an adequate material control and accounting procedure which resulted in a failure to conduct an annual physical inventory of all special nuclear material and a failure to maintain adequate records for control of all special nuclear material. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

10 CFR 70.51(c) requires that each licensee who is authorized to possess at any one time special nuclear material in quantity exceeding one effective kilogram of special nuclear material shall establish and maintain written material control and accounting procedures which are sufficient to enable the licensee to account for the special nuclear material in his possession under license.

10 CFR 70.51(d) requires that each licensee who is authorized to possess at any one time and location special nuclear material in a quantity totalling more than 350 grams of contained U-235... shall conduct a physical inventory of all special nuclear material in his possession under license at interval not to exceed twelve months.

10 CFR 70.51(b)(1) requires that each licensee shall keep records showing the receipt, inventory (including location), disposal, acquisition and transfer of all special nuclear material in his possession regardless of its origin or method of acquisition.

Contrary to the above, the licensee's Administrative Procedure No. ADM-32 was inadequate in that procedure did not address the fundamental elements of material control in the area of storage, inventory, and internal transfers of all special nuclear material (SNM) including incore and excore detectors which resulted in a failure to conduct a physical inventory of all SNM incore and excore detectors, and a failure to maintain records showing the transfer and location of incore detectors transferred from the reactor to high-level radwaste drums.

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

**RESPONSE:**

1. **ADMISSION OR DENIAL OF THE ALLEGED VIOLATIONS:**

The violation is correct as stated.

2. **REASON FOR THE VIOLATION:**

Station procedure (SUADM-0-15) for physical inventory and item control of special nuclear material (SNM) addresses new and spent fuel. This procedure was inadequate because we failed to recognize that a physical inventory and item control were required for detectors containing very small amounts of SNM.

3. **CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:**

A new procedure (PT-28.10) has been created to perform a semiannual physical inventory of the moveable incore detectors and the applicable excore detectors. This procedure includes a physical inventory of those detectors containing SNM that are currently in use, in fresh and spent storage, receipted or shipped offsite.

4. **CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:**

The new procedure (PT-28.10) to perform a semiannual physical inventory of moveable incore detectors and applicable excore detectors was approved by SNSOC on May 19, 1987. This procedure will be revised to provide item control documentation of the receipt, location and transfer of the incore and excore detectors as necessary. The first physical inventory was performed on July 8, 1987. The next physical inventory will be performed by September 30, 1987. Future inventories will be performed on a semi-annual basis to be concurrent with the DOE reporting requirements. The new procedure (PT-28.10) will be revised by September 30, 1987.

5. **THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

Full compliance will be achieved by September 30, 1987.