

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 25, 1987

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

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

Serial No. 87-539
NO/GDM:pms
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. 50-280/87-24 AND 50/281/87-24

We have reviewed your letter of August 25, 1987, in reference to the inspection conducted at Surry Power Station on August 3-7, 1987 and reported in Inspection Report Nos. 50-280/87-24 and 50-281/87-24. 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 AUGUST 3-7, 1987
INSPECTION REPORT NOS. 50-280/87-24 AND 50-281/87-24

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on August 3-7, 1987, a violation of NRC requirements was identified. The violation involved failure to adhere to radiation control procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1987), the violation is listed below:

Technical Specification 6.4.D requires that radiation control procedures be followed.

Health Physics Procedure HP-5.2B.50, Whole Body Counter Operation - Chair/ND 680, dated March 4, 1986, requires the system's energy calibration and the centroid, efficiency, and resolution of each detector be verified in accordance with Procedure HP-5.2b.40, Whole Body Counter Start-up and Performance Checks-Chair/ND 680, prior to first whole body count following a start-up and at least once per shift when in use.

Contrary to the above, the licensee failed to adhere to a radiation control procedure in that, on July 17, 1987, the licensee failed to conduct quality control checks on the whole body counter prior to performing whole body counts.

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/87-24 AND 50-281/87-24

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

The violation occurred due to personnel error and failure to follow approved procedures. The Whole Body Counter (WBC) operator failed to verify that a quality control (QC) check of the equipment had been performed prior to performing a count on the shift. It was assumed that personnel normally assigned this task had completed the QC check earlier in the shift.

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

Written instructions have been issued to all WBC operators to further emphasize and define the method for verification of shift QC checks. Prior to first use on each shift, a QC check must be performed and documented. This computer printout is attached to a new WBC log form to be used for any counts performed during the shift. The shift WBC log and QC printout are retained at the WBC control console until the end of the shift, at which time they are terminated and routed for review. Previous to the violation, the QC check printout was routed separately from the WBC log and was not readily available for verification. The new method described herein was implemented on August 6, 1987 and has prevented any further oversights with regard to WBC QC check requirements.

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

The corrective steps described above in paragraph (3) will be incorporated into Procedure HP-5.2B-50, "Whole Body Counter Operation-Chair/ND 680".

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The revision to HP-5.2B.50 will be completed by November 1, 1987.