VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

February 22, 1988

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

Serial No. 88-053
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. 50-280/87-35 AND 50-281/87-35

We have reviewed your letter of January 25, 1988 in reference to the inspection conducted at Surry Power Station on December 7-11, 1987 and reported in Inspection Report Nos. 50-280/87-35 and 50-281/87-35. Our response to the violation described in 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 DECEMBER 7-11, 1988
INSPECTION REPORT NOS. 50-280/87-35 AND 50-281/87-35

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on December 7-11, 1987, a violation of NRC requirements was identified. The violation involved a failure to adhere to radiation control procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

> Technical Specification 6.4.D requires that radiation control procedures be followed.
>
> Radiation Control Procedure HP 2.3, Contaminated Equipment and Component Control, dated February 2, 1987, requires that all contaminated equipment be surveyed, properly contained, labeled and stored in areas approved by the health physics section.
>
> Contrary to the above, the licensee failed to adhere to radiation control procedures in that several contaminated items were found December 8, 1987, inside a gang box that were not properly bagged or labeled. The area had not been approved by health physics for radioactive material storage.

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/87-35 AND 50-281/87-35

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASON FOR VIOLATION:

The violation occurred due to an oversight on the part of Health Physics personnel responsible for radioactive material storage and labeling requirements. The gangbox was, however, located in a radioactive materials storage area approved by Health Physics.

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

Upon identification of the discrepant condition, the contents of the box were surveyed by Health Physics and properly bagged and labeled, in accordance with procedure HP-2.3.

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

Health Physics checklist instructions for periodic inspection of radiological postings will be revised to require a review of radioactive material storage areas. This review will include inspections of the radiological control area to identify the presence of unauthorized radioactive materials and ensure areas and containers are properly posted and labeled in accordance with station procedures.

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

Full compliance has been achieved. The enhancement to the checklist will be completed by February 29, 1988. The inspection of the RCA and other radioactive materials storage areas identified in the revised checklist will commence in March, 1988.