

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry Nuclear Plant

Docket Nos. 50-280 and 50-281
License Nos. DPR-32 and DPR-37
EA 96-371

During an NRC inspection conducted from January 26 through March 8, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion V and the licensee's accepted Quality Assurance Program, Updated Final Safety Analysis Report, Section 17.2.5, Instruction, Procedures and Drawings, collectively require that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances.

Contrary to the above, the licensee failed to prescribe activities affecting quality in documented instructions or procedures as evidenced by the following examples:

1. On October 29, 1996, a Maintenance Engineering Transmittal Record was issued to specify the limit for backward rotation of safety-related ventilation fans. However, this limitation was not included in the fan Operating Procedures.
2. During 1988, Maintenance Engineering determined that Duxseal was not suitable for use in safety-related ventilation systems. This information was verbally transmitted, but never documented, and as a result, on February 20, 1997, Duxseal was installed on the Auxiliary Ventilation Filter Train.

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

- B. 10 CFR 50.9(a) requires, in part, that information provided to the Commission by a licensee shall be complete and accurate in all material respects.

Contrary to the above, on February 14, 1997, Licensee Event Report 50-280, 281/97-002 was submitted to the Commission and was not accurate in all material respects. Specifically, the reverse rotation limitation of the 58B fan had not been included in the February 7, 1997, Shift Orders as stated in the Additional Corrective Action Section (5.0) of the Licensee Event Report.

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

- C. Technical Specification (TS) 6.4.B requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be adhered to for all operations involving personnel radiation exposure.

ENCLOSURE 1

Health Physics Procedure HP-1081.2, Radiation Work Permits: RWP Briefing and Controlling Work, required, in part, that if individual worker Digital Alarming Dosimeter (DAD) dose and dose rate alarm setpoints are to be used, then the desired alarm settings are to be recorded on the RWP Briefing Attendance Roster and that the alarm settings are to be entered into the Personnel Radiation Exposure Management System (PERMS).

RWP 96-1-0012 for Unit 2 containment entries required, in part, that DADs be set to alarm when the accumulated dose reached 100 mrem, that all members of the entry team were to evacuate containment upon receiving any DAD alarm, and that a special RWP was to be written for any task that an individual's dose is expected to exceed 100 mrem per entry.

Virginia Power Administrative Procedure VPAP-2101, Radiation Protection Program, Revision 11, stipulates that a Radiation Work Permit (RWP) is required for entry into or work in a Radiologically Controlled Area (RCA), that workers shall wear dosimetry required by their RWP, and that workers shall comply with the RWP requirements, instructions, and precautions.

Contrary to the above, TS 6.4.B required personnel radiation protection procedures were not adhered to for all operations including personnel radiation exposure as evidenced by the following examples:

1. On August 17, 1996, the requirements of HP- 1081.2 were not followed, in that, the licensee inappropriately used the "Revised DAD Alarm Setpoint" column of the RWP Briefing Attendance Roster to reflect that the DAD alarm setpoint had been changed to 250 mrem/hour when in fact it had not.
2. On August 17, 1996, the requirements for RWP 96-1-0012 were not followed, in that, the licensee failed to write a special RWP for expected doses in excess of 100 mrem, and workers failed to exit containment when their accumulated dose exceeded 100 mrem and their DADs alarmed.
3. The requirements of VPAP-2101 were not followed, in that, on September 6, 1996, September 13, 1996, October 4, 1996, December 23, 1996, January 10, 1997, and February 3, 1997, individuals entered the RCA without wearing DADs as required by their RWP.

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

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the

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(Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia,
this 7th day of April 1997