

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 11, 1995

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 95-391
SPS/JBC R5
Docket No. 50-280
50-281
License No. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-280/95-10 AND 50-281/95-10

Enclosed is a response to your letter of July 27, 1995, which described an exercise weakness identified during the Surry Power Station full participation exercise of June 14, 1995. This response includes a summary of corrective actions taken to date and those currently in progress that address the identified exercise weakness. Our implementation of these corrective actions will preclude recurrence.

In order to promptly resolve the identified weakness, we request the NRC Resident Inspector staff review our corrective actions during the Emergency Preparedness training exercise scheduled for December 6, 1995.

Please contact us should you have any questions or require further information related to this matter.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

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

Mr. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station

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ATTACHMENT

SURRY POWER STATION

**INSPECTION REPORT NOS. 50-280/95-10 AND 50-281/95-10
EXERCISE WEAKNESS 50-280, 281/95-10-01
SUMMARY OF CORRECTIVE ACTIONS**

SURRY POWER STATION
INSPECTION REPORT NOS. 50-280/95-10 AND 50-281/95-10
EXERCISE WEAKNESS 50-280, 281/95-10-01
SUMMARY OF CORRECTIVE ACTIONS

EXERCISE WEAKNESS:

Damage Control Teams were not expeditiously managed to perform prioritized tasks designated for accident mitigation:

RESPONSE:

Information needed to evaluate the exercise weakness was gathered and reviewed in detail. This review included completed procedures, logs and observer notes. In addition, personnel involved in the portion of the exercise related to the weakness were interviewed. Our evaluation supports the observation that damage control activities were not effectively managed in all cases.

In order to correct the weakness and preclude recurrence, station management formulated and approved an action plan consisting of three major elements:

1. Revise EPIP-3.03, Activation of Operational Support Center, to improve coordination between the OSC and HP regarding designation of protective gear, and to ensure prompt consideration of respirator qualifications when selecting team members.
2. Conduct a Table Top Drill with key staff members (Station Emergency Manager, Emergency Operations Director, Emergency Maintenance Director, Radiological Assessment Director, OSC Director, and Radiation Protection Supervisor), to provide an opportunity for effectively analyzing the issue and formulating appropriate program modifications.
3. Focus on testing enhancements to the damage control process during the Training Exercise scheduled for December 6, 1995.

The development of an initial draft to EPIP-3.03 and performance of the Table Top Drill were completed in July, 1995. The Table Top Drill proved effective and resulted in the identification of additional actions to:

- Clarify activities associated with the acquisition of tools.
- Enhance guidance for selection of personnel qualified for task requirements.
- Streamline the emergency exposure authorization process.
- Define and implement the concept of an "Accident Mitigation Task." This concept specifically identifies critical activities, that is, tasks intended to mitigate core damage and/or radiological releases that challenge public health and safety, to ensure such tasks will be prioritized and dispatched expeditiously.

Revisions to the following procedures (in addition to EPIP-3.03, as mentioned above) have been made to incorporate the above program enhancements:

- EPIP-4.01, Radiological Assessment Director Controlling Procedure
- EPIP-4.02, Radiation Protection Supervisor Controlling Procedure
- EPIP-4.04, Emergency Personnel Radiation Exposure
- EPIP-5.08, Damage Control Guideline

EPIP-3.03, Activation of Operational Support Center, has also been revised to implement guidance regarding the "Accident Mitigation Task" concept, tool acquisition activities and coordination of Operation's personnel assigned to work with Damage Control Teams. EPIP-4.01, Radiological Assessment Director Controlling Procedure, EPIP-4.02, Radiation Protection Supervisor Controlling Procedure, and EPIP-5.08, Damage Control Guideline, also implement guidance regarding the "Accident Mitigation Task" concept, while the revision to EPIP-4.04, Emergency Personnel Radiation Exposure, streamlines the process for authorizing emergency exposure.

It is appropriate to clarify from our evaluation that the bomb damage assessment team was intended to assemble in anticipation of a need to assess the results of an explosion if one had occurred. It was also intended that an operator would have been dispatched immediately to join the team had the scenario included an explosion. Additionally, the evaluation further determined that the decision to have a second team wear street clothes was a conscious decision based on avoiding additional time delays associated with the task of gagging the stuck open safety valve. We believe that these decisions were individually appropriate and within management discretion.

In conclusion, these enhancements will strengthen the emergency response program at Surry Power Station. Communications between the OSC and Radiological Protection organizations regarding radiological protection requirements will be improved. Further, the process for authorizing emergency exposure should be completed more quickly and team dispatch will ultimately be expedited, particularly when activities are identified as "Accident Mitigation Tasks."