

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric & Power Co.
Surry Nuclear Plant

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

During an NRC inspection conducted on August 29 - September 2, September 7-12, and September 27-28, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Paragraph 20.1601, "Control of Access to High Radiation Areas," states in part (a), "The licensee shall ensure that each entrance or access point to a high radiation area has one or more of the following features:

(3) "Entryways that are locked, except during periods when access to the areas is required, with positive control over each individual entry."

Paragraph 20.1602, "Control of Access to Very High Radiation Areas," states "In addition to the requirements in 20.1601, the licensee shall institute additional measures to ensure that an individual is not able to gain unauthorized or inadvertent access to areas in which radiation levels could be encountered at 500 rads or more in 1 hour at 1 meter from a radiation source or any surface through which the radiation penetrates."

Paragraph 20.1101, "Radiation Protection Programs," (a) states "Each licensee shall develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of this part."

Technical Specification 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 approved, maintained, and adhered to for all operations involving radiation exposure.

The following multiple examples of failure to adhere to radiation control procedures were identified:

1. Section 6.8 of VPAP-2101, "Radiation Protection Program," Rev. 6, dated July 28, 1994, stated that the primary method of controlling work that involves radiological hazards is the radiation work permit system. Section 6.3.1.g., of VPAP-2101, stated in part, "If a worker is to enter a posted high radiation area, it is the worker's responsibility to verify he or she is authorized by an radiation work permit to enter the area..."

Contrary to the above, during the period of January 27, through June 18, 1994, six licensee personnel failed to adhere to radiation control procedures and entered the Unit 1 and 2 Incore Sump Rooms on radiation work permits that were not approved for their assigned work. Four of the six entries were made with radiation work permits 94-2-2001 and 94-2-3001 that specifically excluded the Incore Sump

Room as a work location. The following entries were made into the Incore Sump Rooms on radiation work permits that did not adequately address the licensee's controls and requirements for access into the Incore Sump Rooms, which were posted and controlled as very high radiation areas.

During the period of January 28 through 29, 1994, two entries were made into the Unit 1 Incore Sump Room on radiation work permit 94-2-2001;

On January 30, 1994, an entry was made into the Unit 1 Incore Sump Room on Radiation Work Permit 94-2-2047 (Rev. 1);

On March 23, 1994, an entry was made into the Unit 1 Incore Sump Room on Radiation Work Permit 94-2-2074, that did not have specific instructions and additional requirements for entering into a posted and controlled very high radiation area; and

On June 6, 1994, two entries were made into the Unit 2 Incore Sump Room on Radiation Work Permit 94-2-3001.

2. Section 6.3.12, "Access Controls for Very High Radiation Areas," of VPAP-2101 required, in step 6.3.12.c, "Specific SNSOC approval shall be required for planned entry into the area."

Contrary to the above, during the period of January through June 1994, the licensee failed to adhere to radiation control procedures and obtain SNSOC approval for RWPs 94-2-2076, 94-2-2047 (Rev. 5), and 94-2-2090 utilized for entry into the Incore Sump Room, a posted and controlled very high radiation area.

3. Step 6.4.2 of licensee procedure HP-1032.061, "High Radiation Area Key Control," Rev. 0, dated December 7, 1994, required persons receiving a key for access into very high radiation areas review the requirements of Attachment 1, "Requirements and Responsibilities To Enter A Locked High Radiation Area." Step 6.4.3 required the following information be recorded on Attachment 4, "Very High Radiation Area Key Log"; radiation work permit number applicable to entry; gates or areas to be entered or key to be used; key requestor printed name, signature, and TLD badge number; Health Physics coverage technician printed name, signature, and badge number; key issue date and time; initials of person issuing the key, and remarks. Signatures of persons signing Attachment 4 was to indicate that Attachment 1, "Responsibility Review" had been made prior to keys issuance.

Contrary to the above, during the period of January 27 through June 18, 1994, the licensee failed to adhere to radiation control procedures and document the "Responsibility Reviews," and other

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information required by Attachment 4 of licensee procedure HP-1032.061 for all (22) key issues to the Unit 1 and 2 Incore Sump Rooms, posted and controlled as very high radiation areas.

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

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric & Power Co. 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, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for the 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. If an adequate reply is not received within the time specified in this Notice, an order or 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.

Dated at Atlanta, Georgia
this 12th day of OCT 9 1994

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