

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

November 10, 1994

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

Serial No. 94-610
SPS/NS&L
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

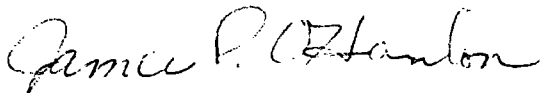
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/94-26 AND 50-281/94-26

We have reviewed your Inspection Report Nos. 50-280/94-26 and 50-281/94-26 dated October 12, 1994, and the enclosed Notice of Violation. The report identified one cited violation for failure to adhere to radiation protection procedures for access to posted and controlled very high radiation areas. Although the examples associated with this violation have low safety significance, we are concerned with the failure to adhere to administrative requirements existing in our procedures.

As described in the attached reply to the Notice of Violation, we have evaluated the circumstances that led to the violation and have initiated corrective actions. Our corrective actions have eliminated administrative inconsistencies between various tiers of access control procedures for entry into the Incore Sump Room. A review of other access control procedures is being performed to ensure administrative consistency of procedures governing access controls for entry into very high radiation areas.

Please contact us if you have any questions or require additional information.

Very truly yours,



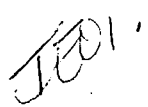
James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

cc: Regional Administrator
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REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION CONDUCTED AUGUST 29 - SEPTEMBER 2,
SEPTEMBER 7-12, AND SEPTEMBER 27-28, 1994
SURRY POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-280/94-26 AND 50-281/94-26

NRC COMMENT:

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 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 that 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 to 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 requester 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 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).

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Reason for the Violation, or if Contested, the Basis for Disputing the Violation

The violation is correct as stated. The examples of procedural non-compliance were caused by personnel error resulting from inattention to detail and in two examples complicated by procedural inconsistencies between provisions of VPAP-2101, Radiation Protection Program, and the controls contained in the lower tier technical implementing procedures. The controls previously established to prevent inadvertent access into the Incore Sump Rooms also contributed to the violation by separating the infrequently used sump room logs and keys from other High Radiation Area (HRA) logs and keys. While this control was effective in limiting access, the logs used for entry into the Incore Sump Room were not updated when the procedure was revised.

While each Incore Sump Room was posted as a Very High Radiation Area (VHRA) due to the radiation levels expected during incore detector movement, this posting was overly conservative and therefore inappropriate for the conditions that existed during the activities involved in the examples. At no time was radiological safety compromised or misunderstood by personnel entering the areas.

Corrective Steps Which Have Been Taken and the Results Achieved

The outdated VHRA key control logs were removed and replaced with the required log from procedure HP-1032.061.

Procedure HP-1032.061 was revised to specify appropriate controls for initial entry and work in the Incore Sump Rooms.

VPAP-2101 was revised to further define when SNSOC approval is needed. Entries into posted VHRAs will continue to require SNSOC approval.

The preliminary findings from the inspection were reviewed by the Radiological Protection Operations staff through required reading.

There have been no further entries into the Incore Sump Rooms. The required VHRA logs are in place for future entries.

Corrective Steps That Will Be Taken to Avoid Recurrence

A review of the interface between VPAP-2101, the health physics administrative procedures (HPAPs), and implementing technical procedures will be performed to ensure that administrative provisions for controls that affect access to VHRAs are

consistent. The review of procedures and any enhancements will be completed by December 1, 1994.

To enhance awareness of the procedural controls for VHRA access, each HP Shift Supervisor will review the procedural requirements for VHRA access control with their personnel. HP Shift Supervisors will complete this review by December 1, 1994.

The Date When Full Compliance Will Be Achieved

Full compliance was achieved October 28, 1994 with the replacement of the outdated logs and the revisions of VPAP-2101 and HP-1032.061.