VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. R. CARTWRIGHT
VICE PRESIDENT
NUCLEAR

December 29, 1988

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

Serial No. 88-800
NO/GDM:pmk R1
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. 50-280/88-42 AND 50-281/88-42

We have reviewed your letter of November 29, 1988 in reference to the inspection conducted at Surry Power Station from October 11-14, 1988 and reported in Inspection Report Nos. 50-280/88-42 and 50-281/88-42. Our response to the violation described in the Notice of Violation is provided 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. R. Cartwright

Attachments

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

8901040397 881229
PDR ADOCK 05000280
Q PDC
8901040397

IE06
1/1

RESPONSE TO THE NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTION
CONDUCTED ON OCTOBER 11-14, 1988
INSPECTION REPORT NOS. 50-280/88-42 AND 50-281/88-42

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on October 11-14, 1988, 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 (1988), the violation is listed below:

Technical Specification 6.4.D requires that radiation control procedures be followed.

The company Radiation Protection Plan, Chapter II, Attachment II-1, requires in item 2 that individuals obey posted, verbal and written Health Physics (HP) instructions.

Health Physics Procedure, HP-9.0.702, Calibration and Operation of Eberline Model PMC-4B/PMP-4C (portal radiation monitor), dated August 29, 1988, requires in Attachment 1, item 2.0 that, once an alarm has sounded, Health Physics is to be notified and the individual causing the alarm is to remain in the area until released by HP.

HP Instructions posted on the portal monitors at the exits in the security control points require, in item 5, that when a contamination alarm sounds with a red lamp:

a. Confirm contamination by using second monitor.
b. If alarm sounds again, individual is to remain in the area.
c. Health Physics is to be notified.

Security General Order Number 24, Duties of Exit Control Officers, dated March 28, 1988, requires in item 5.0, that the exit control officer notify HP if an individual cannot clear the radiation portal monitor and have the person standby for HP instructions.

Contrary to the above, the requirement to follow radiation control procedures was not met in that, during the weeks of September 12-16 and 26-30, 1988, a total of thirteen people were noted exiting the site through alarming or non-functional portal monitors and the individuals were not stopped by security personnel nor did they remain in the area to await release by Health Physics.

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/88-42 AND 50-281/88-42

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

2. REASON FOR THE VIOLATION:

The reason for the violation is inappropriate actions by personnel in response to a malfunctioning portal monitor alarm including the use of an out-of-service monitor. In addition, security personnel were not appropriately positioned to observe the alarm status of the portal monitors or how exiting personnel were using the portals.

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

A security officer has been posted at the exit areas of both security buildings to ensure proper personnel use of and response to alarms from the portal monitors. Audible and visual alarms have also been installed within the main security building to alert Security when a portal monitor alarm has activated.

Additionally, the electronic components suspected of causing spurious alarms and monitor malfunctions have been replaced.

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

As an additional enhancement, out-of-service portal monitors will be equipped with physical barriers to prevent their use by exiting personnel.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was assured when a security officer was posted at each security-controlled exit point on September 27, 1988. The additional enhancement noted in item 4 above will be completed by January 31, 1989.