

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 12, 1989

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

Serial No. 89-369
NO/GDM:pmk R5
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. 50-280/89-09 AND 50-281/89-09

We have reviewed your letter of May 12, 1989 in reference to the inspection conducted at Surry Power Station from April 3-7, 1989 and reported in Inspection Report Nos. 50-280/89-09 and 50-281/89-09. 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. L. Stewart
Senior Vice President - Power

Attachment

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

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RESPONSE TO THE NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTION
CONDUCTED APRIL 3-7, 1989
INSPECTION REPORT NOS. 50-280/89-09 AND 50-281/89-09

NRC Comment:

During the Nuclear Regulatory Commission (NRC) inspection conducted on April 3-7, 1989, 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 (1989), the violation is listed below:

10 CFR 50, Appendix E (IV) requires that the applicant's emergency plans shall contain information needed to demonstrate compliance with the elements set forth below, i.e., ... activation of emergency organization, notification procedures, etc. Table 5.1 of the Emergency Plan titled Minimum Shift Manning Requirements lists the major Functional areas, Major Tasks, Position Title, and approximate response times for Emergency Personnel to augment on shift personnel.

Contrary to the above, based on results from the annual exercise (November 1988), quarterly call out drill (January 1989), and a remedial exercise (February 1989) that included as an objective the demonstration of augmentation capability, the licensee did not meet augmentation staffing requirements within the times set forth in Table 5.1 of the Surry Emergency Plan.

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/89-09 AND 50-281/89-09

1) Admission of the Violation

The violation is correct as stated.

2) Reason for the Violation

The violation was due to an inadequate assessment of discrepancies in augmentation staffing response times as evidenced by the recent exercises and quarterly call out drills.

The response times presently in Table 5.1 of the Surry Emergency Plan are specified as approximate values which were originally derived by an evaluation of geographical location of designated augmentation personnel relative to the plant. Actual results of recent call out drills are inconclusive in validating the original assessment. For several positions, actual response times appear to contradict the associated original assessment. This information was not properly assessed and consequently, only limited corrective actions had previously been taken. Furthermore, incremental impacts on response times due to personnel and organizational changes have not been routinely assessed to substantiate the continuing adequacy of Table 5.1 response times.

3) Corrective Steps Which Have Been Taken and the Results Achieved:

The call out drill process has been formalized into a surveillance test procedure since March 1989. A drill was performed on May 30, 1989, and the augmentation deficiencies were documented in the station deviation process, as required by the surveillance test. Specific areas of deficiency upon which the Notice of Violation is based have been initially addressed.

Short term corrective actions previously instituted included prioritizing the security notification of contacts for augmentation staffing and retraining appropriate personnel regarding notification procedures and requirements. Regarding specific positions where discrepancies in response times were noted, the following actions were taken. The Reactor Engineer duties will be provided by the Shift Technical Advisor until a Reactor Engineer provides augmented support. Additional personnel have been designated to staff the Mechanical Engineer position. The Corporate call out procedure was also prioritized to ensure adequate response by the Recovery Manager and the Radiological Assessment Coordinator.

4) Corrective Steps Which Will Be Taken to Avoid Further Violations:

As noted above, Table 5.1 has been evaluated with respect to function and augmentation requirements. On-shift resources and expertise have been reviewed and will be applied where available to satisfy Table 5.1 requirements. A revision to Table 5.1 will be submitted to the NRC under separate correspondence pursuant to 10 CFR 50.54(q).

A comprehensive evaluation of the emergency response organization's composition will be performed. This evaluation will consider NRC guidance on emergency organization augmentation, on-shift and augmented resources and their respective response capabilities.

5) The Date When Full Compliance Will Be Achieved:

The proposed revision to Table 5.1 will be submitted to the NRC by June 30, 1989.

The comprehensive evaluation of the emergency response organization's composition and response capabilities will be completed by December 31, 1989. Corrective actions associated with this evaluation are intended to be implemented as identified throughout this period.

Full compliance will be achieved upon completion of the evaluation of the emergency response organization and implementation of any associated corrective actions.