

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 11, 1990

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

Serial No. 90-349
NL/RPC R2
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

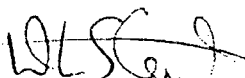
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/90-18 AND 50-281/90-18

Pursuant to the provisions of 10 CFR 2.201, we have reviewed your letter dated May 30, 1990, in reference to the NRC inspection conducted on April 16 - 20, 1990, for Surry Power Station. The inspection was reported in Inspection Report Nos. 50-280/90-18 and 50-281/90-18. Our response to the violation described in the Notice of Violation is provided in Attachment 1.

We have no objection to this inspection report being made a matter of public disclosure.

Should you have any further questions, please contact us.

Very truly yours,


W. L. Stewart
Senior Vice President - Nuclear

Attachment

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

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

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ATTACHMENT 1

REPLY TO A NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTIONS
ON APRIL 16 - 20, 1990
INSPECTION REPORT NOS. 50-280/90-18 AND 50-281/90-18

NRC Comment

During the Nuclear Regulatory Commission (NRC) inspection conducted on April 16 - 20, 1990, 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 (1990), the violation is listed below:

10 CFR 20.103(b)(1) requires the licensee, as a precautionary procedure, use process or other engineering controls, to the extent practical, to limit concentrations of radioactive materials in air to levels below those which delimit an airborne radioactivity area as defined in 10 CFR 20.203(d)(1)(ii).

10 CFR 20.203(d)(1)(ii) defines an airborne radioactivity area as any room, enclosure, or operating area in which airborne radioactive materials composed wholly or partly of licensed material exist in concentrations which, averaged over the number of hours in any week during which individuals are in the area, exceed 25 percent of the amounts specified in Appendix B, Table I, Column 1 of Part 20.

Contrary to the requirements specified above, the licensee failed to utilize, process or other engineering controls to the extent practical to limit airborne radioactivity material below 25 percent (10 MPC-Hrs/Wk) of the amounts specified in Appendix B, Table I, Column 1, in that, between March 23-30, 1990, licensee personnel were in an average airborne concentration of 25 MPC-Hrs/Wk when the radioactivity concentration in the licensee's Auxiliary Building reached 99 times that specified in Appendix B, Table I, Column 1, of Part 20, on March 26, 1990.

This is a severity level IV violation (Supplement IV).

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/90-18 AND 50-281/90-18

(1) **ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:**

The violation is correct as stated.

(2) **REASONS FOR VIOLATION:**

For a period of time prior to the loss of contamination control cited in this violation, a rubber hose had been in use to provide the dewatering flow path from the spent resin shipping containers in the Decontamination Building to a floor drain located in a high radiation area of the Auxiliary Building. In addition, a contamination control barrier had been erected isolating this high radiation area of the Auxiliary Building. As reported to the NRC inspector and documented in the Notice of Violation, on or about March 23, 1990, the floor drain backed up and drained leaving residual contamination which was the source of the airborne contamination detected in the Auxiliary Building on March 26, 1990.

During the time of the loss of contamination control, several ventilation flow perturbations occurred in the area. Contributing to these perturbations were balance problems associated with the Auxiliary Building's ventilation system, the sealing of several ventilation flow paths in adjacent areas, and the running of a Fuel Building heating supply fan without operating the associated area exhaust fans. When the High Radiation Area door was opened for personnel access, radioactive contamination in the higher pressure area was transported into the previously clean area.

(3) **CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:**

- a. A permanent drain line has been installed and is in use for resin shipping container dewatering activities.
- b. A matrix which describes proper ventilation alignment for different plant conditions has been prepared and provided to operating personnel for their use.
- c. The Auxiliary Building central and general ventilation exhaust systems have been balanced.
- d. Station operating procedures have been changed to require that a temporary modification (TM) be performed and documented for the use of temporary hookups which will be used for handling radioactive process fluids. Such TMs are reviewed by Radiological Engineering and approved by SNSOC prior to initial use.

(4) **CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:**

Additional walkdowns will be conducted to determine if other contamination control barriers exist which could, under certain ventilation configurations, permit a similar event to take place. Any such installations will be evaluated and modified as necessary.

(5) **THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

System walkdowns will be completed and corrective actions will be implemented by September 30, 1990.