

ENCLOSURE 1

NOTICE OF VIOLATION

Virginia Electric and Power Company  
Surry 1 and 2

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

During an NRC inspection conducted on March 29 - April 2, 1993, 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:

10 CFR 20.203(c)(2)(iii) requires that each entrance or access point to a high radiation area shall be maintained locked except during periods when access to the area is required, with positive control over each individual entry.

10 CFR 20.203(c)(3) states that the controls required by 10 CFR 20.203(c)(2) of this section shall be established in such a way that no individual will be prevented from leaving a high radiation area.

Technical Specification 6.4.1.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.

Attachment 1, Requirements and Responsibilities to Enter a Locked High Radiation Area, of Health Physics Procedure HP-8.0.61, High Radiation Area Key Control, Revision 1, dated April 16, 1991, requires, in Step 2.3, that when a Locked High Radiation Area entrance is unlocked, the entrance is to be under constant surveillance to prevent unauthorized entries; and, in Step 2.4, that when leaving the area, no one is to be left in the area and the entrance is to be securely locked.

Contrary to the above, on March 30, 1993, the licensee's Locked High Radiation Area control measures failed when two region-based NRC inspectors conducting a tour were inadvertently locked in the Unit 2 "C" Reactor Coolant Loop Room, a locked high radiation area. The licensee failed to maintain constant surveillance over the loop room entrance while it was unlocked and failed to verify that no one was left in the area after relocking the entrance. As a result, the inspectors were temporarily prevented from leaving the high radiation area when the entrance door, unlocked at the time of entry, was chained and padlocked prior to their exit from the loop room. No unnecessary radiation exposures were received.

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

Pursuant to the provisions of 10 CFR 2.201, Virginia Electric and Power Company 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, and a copy to

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the NRC Resident Inspector at the facility that is the subject of this Notice, 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: (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 29<sup>th</sup> day of APRIL 1993