

APPENDIX A

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry Unit 2

License No. DPR-37

Based on the NRC inspection April 15-19, 1979, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below.

- A. 10 CFR 20.101(b)(1) requires that the dose to the whole body of any individual in a restricted area shall not exceed 3 rems during any calendar quarter.

Contrary to the above, on April 14, 1979, an employee received a whole body dose of approximately 10 rems during an entry into the incore instrument room.

This violation constituted an occurrence related to health and safety.

(Civil Penalty - \$4,000)

- B. Technical Specification 6.4.B.1.(i) and 6.4.D require that stringent administrative procedures shall be implemented and followed to assure adherence to the restriction placed on the entrance to a high radiation area and the radiation protection program. Section 1.3.F.4 of the facility Health Physics Manual states that any area posted with a radiation warning placard signifies the existence of a potential hazard and the placard instructions must not be violated. On April 14, 1979, the entrance to the Unit 2 incore instrument room was placarded with the following instruction: "High Radiation Area - Prior Health Physics Notification Required for Entry."

Technical Specifications 6.4.B.1.(g) requires that a radiation work permit system shall be used to authorize and control work performed in high radiation areas. Section 1.3.F.5 of the facility Health Physics Manual requires issuance of a special Radiation Work Permit (RWP) for non-routine jobs or to cover unusual circumstances on a routine job.

Contrary to the above, on April 14, 1979, a worker entered the Unit 2 incore instrument room, a high radiation area, without prior notification of health physics personnel and without issuance of a special RWP to authorize and control this non-routine job. The worker was overexposed to approximately 10 rems during this entry.

This violation contributed to an occurrence related to health and safety.

(Civil Penalty - \$4,000)

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- C. 10 CFR 20.201(b), requires that each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part. 10 CFR 20.201(a) defines a survey as "an evaluation of the radiation hazards...under a specific set of conditions".

Contrary to the above, a survey adequate to comply with the radiation exposure limits of 10 CFR 20.101 was not made in that a worker entered the Unit 2 incore instrument room on April 14, 1979, and received an exposure of approximately 10 rems.

This violation contributed to an occurrence related to health and safety.

(Civil Penalty - \$4,000)

- D. Technical Specification 6.4.B.1.(e) requires that any individual permitted to enter a high radiation area be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.

Contrary to the above, on April 14, 1979 a worker was permitted to enter the Unit 2 incore instrument room, a high radiation area, without the required radiation monitoring device.

This is an infraction.

(Civil Penalty - \$3,000)

- E. 10 CFR 20.403(b) requires that each licensee shall within 24 hours notify by telephone and telegraph, mailgram, or facsimile, the Director of the appropriate NRC Regional Office of any incident which may have caused "exposure of the whole body of any individual to 5 rems or more of radiation".

Contrary to the above, although telephone notification was completed within 24 hours, written notification of a whole body exposure of approximately 10 rems on April 14, 1979, was not transmitted to the Region II Director until April 17, 1979.

This is a deficiency.

(Civil Penalty - \$0)

This Notice of Violation is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulation. You are hereby required to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply, including for each item of noncompliance: (1) admission or denial of the alleged items of noncompliance; (2) the reasons for the items of noncompliance, if admitted; (3) the corrective steps which have been taken by you and the results achieved; (4) the corrective steps which will be taken to avoid further non-compliance; and (5) the date when full compliance will be achieved.

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