

APPENDIX A

NOTICE OF VIOLATION

Virginia Electric and Power Company
Surry 1 and 2

License Nos. DPR-32
DPR-37

Based on the NRC investigation conducted during the period June 18, 1979 - May 21, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated December 31, 1974.

- A. As required by Technical Specification 3.11.A.5, liquid waste activity and flow rate shall be continuously monitored and recorded during release by the liquid waste disposal radiation monitor and the liquid waste recorder. During liquid waste release the circulating water discharge tunnel radiation monitor shall be operating.

Contrary to the above:

1. Liquid waste releases (Nos. 79-915 and 79-916) were made from the Contaminated Drain Tanks on April 3, 1979, during a period that the liquid waste disposal radiation monitor, RM-LW-108 was not functioning properly as indicated by Radiation Recorder RR-175.
2. Many liquid waste releases were made from the Contaminated Drain Tanks and the Liquid Waste Test Tank during periods when Maintenance Reports (MRs) indicate the discharge tunnel radiation monitor RM-SW-120 should have been declared inoperative. For example, MR S1907170621 which was initiated at 0621 hours on July 17, 1979, described the problem as "monitor spikes." The MR indicated that the photomultiplier tube in the detector was replaced and the monitor was recalibrated on July 18, 1979. Yet records indicate that 10 liquid waste releases were made between initiation of the MR and 2400 hours on July 17, 1979.
3. Nine liquid waste releases were made during the period 0600 hours to 2330 hours on February 25, 1979, when distances between time marks on the Radiation Recorder RR-175 charts, as measured by NRC investigators, indicate that the recorder was without chart paper or was turned off for approximately 16½ hours during that period.

This is infraction.

- B. As required by Technical Specification 6.4, detailed written procedures with appropriate check-off lists and instructions shall be provided and followed.

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Contrary to the above:

1. Operating Procedure OP-22.5, "Contaminated Drains System" and/or Annunicator Procedures 1WD-9 and 1WD-11, "Contaminated Drain Tank Hi-Lo Level" were not followed on at least six occasions during 1979 (Release Nos. 79-01, 79-06, 79-546, 79-547, 79-571 and 79-574) in that the liquid waste flow recorder charts indicate that the volumes discharged were between 1800 and 2500 gallons, while the maximum which could be released following the procedures would be 1116 gallons for simultaneous release of both Contaminated Drain Tanks.
2. Preventive maintenance procedures have not been followed in that preventive maintenance on various pieces of equipment had not been performed at the frequency established by the procedures and was overdue at the time of the investigation. Examples include the Component Cooling Water Pumps which are required by Procedure MMP-P-CC-002 to receive preventive maintenance on an annual basis. As of May 8, 1980 three of the four pumps (B, C and D) were overdue by at least six months.
3. Various operations for which written procedures having individual procedural step sign-off in accordance with Section 5 of the VEPCO Nuclear Power Station Quality Assurance Manual and Surry Administrative Procedure No. 29, were performed without the appropriate procedure being signed off as the individual steps were accomplished. A specific example includes the releases of liquids from the Contaminated Drain Tanks.

This is an infraction.

- C. As required by Technical Specification 3.11.A.4, prior to release of radioactive wastes a sample shall be taken and analyzed to demonstrate compliance with Technical Specification 3.11.A.1 which establishes the permissible concentrations of radionuclides leaving the circulating water discharge canal.

Contrary to the above, representative samples were not taken before releases from the Contaminated Drain Tanks on various unknown dates in that various licensee operators admitted having: (1) taken samples without having recirculated the contents of the tanks to ensure thorough mixing; and (2) taken a single sample from both tanks simultaneously without knowing the relative contribution of the individual tanks to the composite sample.

This is an infraction.

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Appendix A
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- D. As required by 10 CFR 20.201, each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in 10 CFR Part 20. Surveys as defined in 20.201 means an evaluation of the radiation hazards incident to the ... release or presence of radioactive materials under a specific set of conditions.

Contrary to the above, at the time of the investigation (and although the licensee was documenting the releases) the licensee had not performed an evaluation of the periodic presence of tritium, cesium-134, cesium-137, cobalt-58, cobalt-60 and iodine-131 in water entering a turbine building floor drain and being released to the unrestricted area.

This is an infraction.