

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

8109211 AS: 5
September 3, 1981

R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

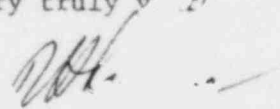
Serial No. 487
NO/RMT:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of August 4, 1981 in reference to the inspection conducted at Surry Power Station between July 6-10, 1981 and reported in IE Inspection Report Nos. 50-280/81-20 and 50-281/81-19. Our responses to the specific infractions are attached. In reference to the telecon of September 4, 1981 between H. C. Dance of your staff and E. R. Smith, Jr., the submittal date of this response was extended from September 3, 1981 to September 4, 1981.

Under the provisions of Section 2.790(d) Part 2, Title 10, Code of Federal Regulations, the Virginia Electric and Power Company considers the information in the attached pages to be proprietary and therefore, exempt from public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

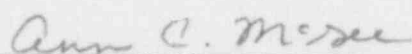

R. H. Leasburg

Attachment

City of Richmond

Commonwealth of Virginia

Acknowledged before me this 3rd day of Sept., 1981


Notary Public

Commission expires: 2-26, 1985

SEAL

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

8109250397 810916
PDR ADOCK 05000280
Q PDR

RESPONSE TO NOTICE OF VIOLATION
APPENDIX A
INSPECTION AND ENFORCEMENT

NRC COMMENT:

- A. 10 CFR 73.55(c)(3) requires that the isolation zones shall be maintained in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and shall be of sufficient size to permit observation of the activities of people on either side of that barrier in the event of its penetration. 10 CFR 73.55(c)(4) requires that all exterior areas within the protected area shall be periodically checked to detect the presence of unauthorized persons, vehicles, or materials.

Paragraph 3.1.2 of the approved physical security plan states, "Protected area barrier fencing is installed...and is clear of objects that could prevent assessment of security contingencies for a distance of at least twenty feet inside, to at least 20 feet outside the protected area."

Contrary to the above, on July 8, 1981, two large wooden crates were observed within the isolation zone approximately 15 feet from the protected area fence on the inside of the protected area. The isolation zone violation was reported by security personnel on July 7, 1981. However, corrective action had not been initiated.

This is a Severity Level VI Violation (Supplement III.F).

RESPONSE:

1. Admission or denial of the alleged violation(s).

The alleged violation is not denied.

2. The reason for the violation, if admitted.

The two wooden crates, located in the isolation zone, did not prevent assessment of Security contingencies. Three sides of the crates were in the visual observation range of two Defensive Positions, DP1 and DP2. The contractor supervisor, who had the crates placed in the isolation zone had been contacted by Security on July 7, 1981 and he stated that the crates could not be moved until July 8, 1981.

3. The corrective steps which have been taken and the results achieved.

Beginning on July 7, 1981, and as noted in the Security Shift Blotter, Defensive Position #1, on each shift, was instructed to increase and to maintain increased surveillance of the area until the crates were removed. The crates were removed on July 8, 1981.

4. The corrective actions which will be taken to avoid further violations.

Markers have been made on fences and buildings which readily denote the twenty foot isolation zone boundaries and which assist Security Personnel in determining the isolation zone boundaries. The Security Force has been instructed to more vigorously enforce the requirements of the Security program which should minimize the need to provide compensatory measures for avoidable degradation to the isolation zone and has been instructed to take immediate compensatory actions for unavoidable violations or to report the violation to higher authority.

5. Date when full compliance will be achieved.

Full compliance was achieved on September 3, 1981.

NRC COMMENT:

- B. 10 CFR 73.55(d)(4) requires that designated licensee vehicles shall be limited in their use to onsite plant functions and shall remain in the Protected Area except for operational, maintenance, repair, security and emergency purposes. The licensee shall exercise positive control over all such designated vehicles to assure that they are used only by authorized persons and for authorized purposes.

Paragraph 13.12 of the approved physical security plan states, "Records of designated vehicles authorized unescorted access to the Protected Area are maintained by the Station Security Supervisor on the Designated Vehicle List (General Order Number 13). Data recorded includes make, model, license number, registered owner, period of authorization, authority and date, and signature of authorizing authority.

Contrary to the above, on July 8, 1981, a Chevrolet Van, license number 29564 bearing VEPCO vehicle no. 2799 was observed within the Protected Area. Review of the current General Order Number 13, Designated Vehicles, revealed that VEPCO vehicle no. 2799 was described as a 1979 Dodge Pick-up truck with license no. TC 17493. The Chevrolet Van was not included in General Order Number 13.

This is a Severity Level VI Violation (Supplement III.F).

RESPONSE

1. Admission or denial of the alleged violation.

The facts as stated are correct. The description of VEPCO Company, vehicle number 2799 on the current General Order Number 13, Designated Vehicles, was inaccurate.

2. The reasons for the violation, if admitted.

There was a transcription error in compiling the Designated Vehicle List. Although the written description of the vehicle was incorrect, the vehicle had been a designated vehicle since September 1980, and was readily recognized by members of the Security Force as a designated vehicle. The vehicle was thoroughly searched by a Security Force Member prior to the vehicle being granted access to the Protected Area and, the vehicle was operated by an individual who had been authorized unescorted access to the Protected Area.

3. The corrective steps which have been taken and the results achieved.

The General Order Number 13, Designated Vehicles, was reviewed and corrected as required.

4. The corrective steps which have been taken to avoid further violations.

The responsibility for monthly review of General Order Number 13, Designated Vehicles, has been delegated to a Security Shift Supervisor. Prior to being granted unescorted access to the Protected Area, each designated vehicle will be described by the Searching Officer to the CAS Operator, who will verify the description with that recorded on the Designated Vehicle List.

5. The date when full compliance will be achieved.

Full compliance was achieved on or about July 9, 1981.