# VIRGINIA ELECTRIC AND POWER COMPANY Richmond, Virginia 23261

June 16, 1982

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R. H. LEANBURG VICE PRESIDENT NUCLEAR OPERATIONS

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Mr. James P. O'Reilly, Regional Administrator U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, Suite 3100 Atlanta, Georgia 30303 Serial No. 324 NO/RMT:acm Docket Nos. 50-338 50-339 License Nos. NPF-4 NPF-7

Dear Sir:

We have reviewed your letter of May 21, 1982 in reference to the inspection conducted at North Anna Power Station on April 8, 9, and 12, 1982 and reported in IE Inspection Report Nos. 50-338/82-11 and 50-339/82-11. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of 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

cc: Mr. Robert A. Clark, Chief Operating Reactors Branch No. 3 Division of Licensing

## RESPONSE TO NOTICE OF VIOLATION ITEM REPORTED DURING NRC INSPECTION CONDUCTED ON APRIL 8,9, AND 12, 1982

### NRC COMMENT

10 CFR 20.201(b) requires licensees to make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations in 10 CFR 20, and are reasonable under the circumstances to evaluate the extent of the radiation hazards that may be present.

Contrary to the above, on January 14, 1982, a group of fifteen individuals exited the radiological controlled area while known to be contaminated without an adequate verfication of the contamination level or identification of the contaminant.

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

#### RESPONSE

#### 1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The Notice of Violation is correct as stated.

#### 2. REASONS FOR THE VIOLATION

The violation was due to personnel error. Routine health physics practices were not followed in an effort to prevent undue concern on the part of individuals not familiar with contamination or radiation effects. The alarm setpoint was intentionally set higher; however, the deflection of the meter and audio response were constantly monitored by the Health Physics personnel. Although the exact amount and type of contamination was not specifically identified prior to allowing the visitors to exit the area, the knowledge of the Health Physics personnel and experience with the contamination earlier that day were sufficient to identify the contaminant as Rubidium 88.

The relatively low level of contamination by a short-lived radioisotope did not endanger the health or safety of the individuals involved. Allowing the visitors to exit the area did not lead to an uncontrolled spread of contamination. Consequently, as stated in §20.201(b)(2), the actions could be construed as reasonable under the circumstances to evaluate the extent of radiation hazards that were present.

The delay in reporting of this event was the result of a failure of the employees involved to communicate with Company management. The event was not known about until it came to management's attention as a result of discussions with employees concerning an unrelated matter. It was at that time that the appropriate actions were taken both within the company and with outside parties.

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- 3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED The personnel involved were counselled and disciplined.
- 4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS No further corrective actions are necessary.
- 5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

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