

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

January 20, 1983

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 007
NO/RMT:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Sir:

We have reviewed your letter of December 21, 1982 in reference to the inspection conducted at Surry Power Station between November 1-5, 1982 and reported in IE Inspection Report Nos. 50-280/82-33 and 50-281/82-33. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to these 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,

W. L. Stewart
W. L. Stewart

Enclosure

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

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/82-33 AND 50-281/82-33

NRC COMMENT:

As a result of the inspection conducted on November 1-5, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification, Section 6.4.D. requires that all radiation control procedures be followed.

Contrary to the above, radiation control procedures were not followed in that:

- a. On September 29, 1982, and October 27, 1982, Quality Assurance personnel failed to initial the quality assurance verification of cask payload and vehicle placards respectively on Surry Power Station Shipping Container Checkoff Sheet, Cask Shipments Only as required by Health Physics Procedure HP-3.9.4.
- b. On November 3, 1982, loose surface contamination greater than 1000 dpm/100 cm² of beta-gamma activity was found on and around the unrestricted area of the component cooling water heat exchangers located on the nine foot six inch level of the turbine building. Health Physics Procedure HP-1.3.2 states that contamination levels shall be less than 1000 dpm/100 cm² of smearable beta-gamma activity in unrestricted areas within the site boundary.
- c. On November 3, 1982, a personnel contamination occurred at the Surry Power Station resulting in contamination of 1200 dpm/probe area on the individual's right hand. A Form HP-3 "Personnel Decontamination Record" was not completed subsequent to decontamination as required by Health Physics Manual HP-2.4.1.

This is a Severity Level V Violation (Supplement IV).

RESPONSE:

- (1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

- (2) REASONS FOR VIOLATION:

The reason for the violations described in examples a. and c. above were personnel error and failure to follow approved procedures. For example b., the reason for the violation was determined to be inadequate procedural guidance with regard to turbine building surveys.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

With regard to example a., the requirements of Health Physics Procedure HP-3.2.9, Packaging and Shipment of Solid Radioactive Waste, have been reviewed with all Health Physics and Quality Control personnel who deal with such shipments. The requirement to review all documentation for accuracy and completeness was stressed. The contaminated area described in example b. was properly posted and barricaded immediately after identification and was subsequently decontaminated to within acceptable levels. Pipe caps which were missing from the heat exchanger drain lines were replaced and checked for further leakage. The health physics technician who failed to initiate a Form HP-3 "Personnel Decontamination Record" when the incident described in example c. occurred has been counseled and reinstructed in proper documentation of such incidents.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

No further action is deemed necessary with regard to the violation described in example a. The procedural inadequacy which led to the undetected contamination in the turbine building (example b.) will be corrected by procedure revision and improvements in the turbine building survey maps used by technicians. These changes will highlight those areas where the potential for contamination is greatest and direct additional surveillance in those areas. The requirements for documentation of personnel contamination incidents will be reviewed to determine if changes are warranted. In the interim, the existing requirements for documentation of such incidents will be reemphasized with all health physics personnel and additional instructions will be posted at all frisking stations to remind workers of the requirement to report contamination. These actions should prevent a recurrence of example c.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved with regard to the specific violation examples cited. The additional preventive measures discussed in item (4) above will be completed by March 1, 1983.

NRC COMMENT:

- B. 10 CFR 20.203e(1), requires that each area or room in which licensed material is used or stored and which contains any radioactive material (other than natural uranium or thorium) in an amount exceeding 10 times the quantity of such material specified in Appendix C of 10 CFR 20 be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "Caution" or "Danger, Radioactive Material(s)."

Contrary to the above, radioactive material storage areas were not posted in accordance with 10 CFR 10.203e(1) in that:

- a. "E" Building used for contaminated tool storage and waste compacting was not posted.
- b. The high radiation area containing 55 gallon drums located immediately West of the Unit 1 containment equipment access was not posted.

This is a Severity Level V Violation (Supplement IV).

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

In both examples cited above, the reason for the violation was an oversight on the part of health physics personnel responsible for those areas.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Due to the amount of material handling movement and processing which takes place in the restricted controlled area yard and buildings, it has been determined that compliance with 10 CFR 20.203(e) could be assured most efficiently by posting the entire area (i.e., all entrances to the area) with the required signs. This has been accomplished. In addition, those areas or buildings where radioactive materials are routinely stored or processed have also been properly posted.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

No further corrective actions are deemed necessary.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.