VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261 84 MAR 2 All: 40 W. L. STEWART VICE PRESIDENT March 27, 1984 NUCLEAR OPERATIONS Mr. James P. O'Reilly Serial No. 132 Regional Administrator NO/WDC:acm Docket No. 50-280 Region II U. S. Nuclear Regulatory Commission License No. DPR-32 101 Marietta Street, Suite 2900 Atlanta, Georgia 30303 Dear Mr. O'Reilly: We have reviewed your letter of February 27, 1984, in reference to the inspection conducted at Surry Power Station on January 3-31, 1984, and reported in IE Inspection Report No. 50-280/84-04. Our response to the specific infraction is attached. We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure. information contained in the attached pages is true and accurate to the best of my knowledge and belief. Very truly yours, Attachment cc: Mr. Steven A. Varga, Chief Operating Reactors Branch No. 1 Division of Licensing Mr. D. J. Burke NRC Resident Inspector Surry Power Station

# RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT NO. 50-280/84-04

## NRC COMMENT:

The following violations were identified during an inspection conducted on January 3-31, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification 3.11.8.4 requires that gross and particulate activity and flow rate be continuously monitored and recorded during the release of radioactive gaseous wastes to the process vent.

Contrary to the above requirements, the contents of the A waste gas decay tank were released to the process vent from 3:15 p.m. on January 10, 1984, until 9:22 a.m. on January 11, 1934, without continuously monitoring gaseous gross and particulate activity. Proper flow was not naintained to the process vent radiation monitors RI-GW-101 and 102 due to a failure of the air sampling pump. The redundant process vent effluent radiation monitor RI-GW-130-1 was also inoperable due to equipment failures.

This is a Severity Level IV Violation (Supplement I), and applies to Unit 1.

# RESPONSE:

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

The violation is correct as stated.

#### (2) REASONS FOR VIOLATION:

This violation is primarily resultant from multiple equipment failure in that the process vent air sampling pump failed. This failure went undetected because of a malfunction in the flow fault detections/alarm circuit. To a lesser degree the violation is attributable to inadequate procedure because verification of proper operation of the process vent monitoring system is not performed immediately prior to release.

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

The process vent air sampling pump and flow fault detection circuit have been repaired and are functioning properly.

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

The operating procedure for releasing WGDT's is being improved to include local flow verification for the process vent air sampling pump immediately prior to releases. The procedure will be changed by April 6, 1984.

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

Full compliance has been achieved.