

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

AUG 10 10 33
August 3, 1984

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No.: 423
NO/DWL,RFS/lms
Docket Nos.: 50-280
50-281
License Nos. DPR-32
DPR-37

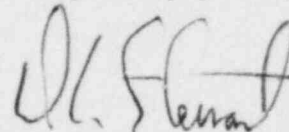
Dear Mr. O'Reilly:

We have reviewed your letter of July 3, 1984, in reference to the inspection conducted at Surry Power Station between May 29, 1984 and June 1, 1984 and reported in IE Inspection Report Nos. 50-280/84-18 and 50-281/84-19. Our response to the specific infraction is attached.

Pursuant to the telephone conversation held on June 22, 1984, between J. L. Wilson and H. C. Dance, a review of station radioactive material shipment procedures has been performed and procedural modifications are in progress to provide additional assurance of proper load bracing and shoring prior to transport. These modifications will be completed by August 15, 1984.

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. 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

Attachment

cc: Mr. Richard C. Lewis, Director
Division of Project and Resident Programs

Mr. Steven A. Varga
Operating Reactors Branch No. 1
Division of Licensing

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/84-18 and 50-281/84-19

A. NRC COMMENT:

10 CFR 20.311 (d)(3) requires that any licensee who transfers radioactive waste to a land disposal facility conduct a quality control program to assure compliance with 10 CFR 61.55 and 61.56. The quality control program must include audits.

Contrary to the above, the requirements to conduct a quality control program which included audits was not met, in that no audits which evaluated licensee compliance with the requirements of 10 CFR 61 had been performed or scheduled.

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 violation was determined to be a misinterpretation of the audit requirements on the part of the Quality Assurance Department. A consultant was hired to develop a 10 CFR 61 Compliance Program Description and HP.3.2.9 was written to reflect the program description. The existing audit program for Health Physics verified compliance with approved procedures and was considered to meet the intent of 10 CFR 20.311 (d)(3) since HP.3.2.9 was specifically written to address the requirements of 10 CFR 61. Several audits had been conducted prior to the notice of violation and in addition, Quality Control Inspectors witness the preparation of every shipment that leaves the Station, all of which ensures compliance to procedure.

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

A special audit was conducted to evaluate compliance with the requirements of 10 CFR 61. It was determined from the audit that compliance with the requirements of 10 CFR 61 have been achieved.

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

The requirement of 10 CFR 20.311 (d)(3) has been thoroughly reviewed by the Quality Assurance Department and all future audits of Health Physics will evaluate compliance with the requirements of 10 CFR 61.

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

Full compliance has been achieved.