



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

AUG 10 1988

Report Nos.: 50-338/88-18 and 50-339/88-18

Licensee: Virginia Electric and Power Company
Richmond, VA 23261

Docket Nos.: 50-338 and 50-339

License Nos.: NPF-4 and NPF-7

Facility Name: North Anna 1 and 2

Inspection Conducted: June 6-10, 1988

Inspectors: C. M. Hosey
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R. B. Shntridge
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Approved by: C. M. Hosey
C. M. Hosey, Section Chief
Division of Radiation Safety and Safeguards

8/9/88

Date Signed

8/8/88

Date Signed

8/9/88

Date Signed

SUMMARY

Scope: This routine, unannounced inspection involved onsite inspection in the area of radiation protection and included: external exposure control and dosimetry; internal exposure control and assessment; control of radioactive materials; contamination, surveys and monitoring; solid waste, transportation of radioactive materials and training and qualifications.

Results: Based on the results of interviews with licensee management, supervision, and personnel from different departments; review of records and pertinent health physics data; inspector surveys and health physics personnel's knowledge of functions and responsibilities regarding department operations, the inspectors found the Radiation Protection to be functioning adequately. However, weaknesses were found in the radiation monitoring program for equipment leaving the RCA and the release of equipment for uncontrolled use, Paragraph 5.a.

Within the areas inspected, the following violations were identified:

- Failure to perform adequate radiation surveys for contamination, Paragraph 5.a.
- Failure of personnel to comply with requirements for entries into a high radiation area, Paragraph 3.b (licensee identified).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*M. L. Bowling, Assistant Station Manager, Nuclear Safety and Licensing
E. W. Dreyer, Supervisor, Health Physics
*R. F. Driscoll, Manager, Quality Assurance
*R. O. Enfinger, Assistant Station Manager, Operations and Maintenance
*D. A. Heacock, Supervisor, Technical Services
R. R. Irwin, Supervisor, Health Physics
*M. R. Kansler, Superintendent, Maintenance
T. Peters, Assistant Supervisor, Health Physics
*J. H. Leberstien, Engineer, Licensing
*T. L. Porter, Supervisor, Nuclear Licensing
*D. E. Quarz, Associate Engineer
*A. H. Stafford, Superintendent, Health Physics
*J. A. Stall, Superintendent, Operations
*F. L. Thomasson, Supervisor, Corporate Health Physics
*W. A. Thornton, Director, Corporate Health Physics and Chemistry

Other licensee employees contacted during this inspection included engineers, operators, mechanics, security force members, technicians, and administrative personnel.

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*J. Caldwell, Senior Resident Inspector
L. King, Resident Inspector

*Attended exit interview

2. Training and Qualification (83723)

The licensee was required by 10 CFR 19 to provide basic radiation protection training to workers. Technical Specification (T.S.) 6.4 and Regulatory Guides 8.13, 8.27, and 8.29 outline topics that should be included in such training.

a. General Employee Training

The inspector reviewed quality assurance audit N-87-14 for non-licensed personnel training and qualification. The audit found that General Employee Training (GET) was administered in accordance with station administrative procedure 2.3 for non-licensed personnel.

No violations or deviations were identified.

b. Health Physic Site and Contract Technicians

To increase awareness and depth of training, a three hour course on hot particle monitoring and control was provided to all health physics technicians. The training included instruction on evaluation of hot particles, contamination posting and access controls, radiologically controlled areas and hot particles, contamination surveys, considerations for radiation work permits, use of controls for protective clothing, and personnel contamination monitoring and dose assessments. In addition, a practical factors training session was given using radioactive sources of various beta energies to demonstrate the effects on different instrument types, shielding material, speed of frisking, and distance of hot particles from the detector. Also, the problems associated with personnel hot particle contamination and monitoring a smear from a contaminated hot particle area were evaluated. The inspector noted that lesson plans and job performance measures were changed to reflect the most current hot particle detection instruction.

In addition to the HP technician specialized training, all station personnel were given a one hour training session on personnel contamination and hot particle awareness.

No violations or deviations were identified.

c. Continuing Training

The inspector discussed continuing training with licensee representatives. As a followup corrective action to a hot particle skin contamination, the licensee was providing training to laundry operators on the new automated laundry monitor. Sixteen laundry operators were given a three day training course on new contamination limits for protective clothing, precautions associated with laundering and frisking protective clothing, and hot particle contamination detection. The training session included a practical factors session where each student operated the laundry monitor and used a radioactive source to display the different alarm functions of the monitor. The inspector observed the practical factors demonstration and noted that the material content of the session and instruction was satisfactory.

No violations or deviations were identified.

3. External Occupational Exposure Control and Dosimetry (83724)

a. Personnel Monitoring

10 CFR 20.202 requires each licensee to supply appropriate personnel monitoring equipment to specific individuals and require the use of such equipment. The inspector reviewed the licensee's procedures for issuance, control and calibration of self reading dosimeters (SRDs).

The inspector verified that the licensee drift tested and response checked SRDs. The inspector toured the licensee's calibration facility where SRDs were response checked. The inspector verified that the licensee had sources and detectors (condenser R meters) that were traceable to the National Bureau of Standards (NBS). The inspector reviewed serial numbers and certification papers for the standards. The licensee response checks and drift tests two batches of SRDs which replace each other on a semi annual basis. The inspector noted that the licensee utilized one source for response checks of dosimeters, TLDs, and most instruments. The SRD response calibration sheets did not have the source serial numbers recorded. The inspector discussed the traceability of the response process and the licensee agreed to document the source serial numbers on the SRD response documents.

The inspector also reviewed the licensee's control procedures for SRDs. The licensee issues SRDs to individuals entering the RCA. The individual's Radiation Work Permit (RWP) number, SRD identification number, and SRD reading are tracked by a computer program. Upon exiting the RCA and a particular RWP, the licensee surveys the SRD and records the reading in the computer. The SRD data is used to track an individual's exposure during each "LD assignment. The inspector discussed the licensee's procedure for lost SRDs. If an individual loses a SRD, the individual's TLD is processed. This is also done if a SRD is turned in off scale to determine current personnel exposure. The inspector determined that SRDs found in the RCA or SRDs known to have been dropped or turned in off scale were surveyed and drift tested. The inspector discussed the need to verify that the SRD that may have been damaged were response checked prior to reissuance. Licensee representatives agreed that potentially damaged SRDs should receive a response check prior to issuance to ensure proper operability. The inspector stated that SRD response check criteria would be reviewed during a subsequent inspection and would be tracked as Inspector Followup Item (IFI) 50-338/88-18-01.

The licensee has a TLD program that has been accredited by NAVLAP and is approved until October 1, 1988. The licensee had recently completed the dosimetry testing portion for recertification and the inspector reviewed the results of the test. The licensee's TLD program is certified in categories II, IV, V, VII and the licensee had passed in all categories on the recertification test. The inspector also determined that the plant participates in a performance test of the TLD program conducted by the corporate office twice a year. The inspector determined that the licensee had also passed the corporate sponsored TLD test.

No violations or deviations were identified.

b. Control of Radiological Areas

10 CFR 2.203 specifies posting, labeling and control requirements for radiation areas, high radiation areas, airborne radioactivity areas and radioactive material areas.

T.S. 6.12.1 requires that in lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1,000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a RWP. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- (1) A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- (2) A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- (3) An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist (HP) in the RWP.

T.S. 6.12.2 requires the areas having a dose rate in excess of 1,000 mr/hr be locked to prevent unauthorized entry in addition to the requirements of T.S. 6.12.1.

Inspection Report Nos. 50-338/88-02 and 50-339/88-02 identified an Unresolved Item regarding a number of events of personnel noncompliance with T.S. 6.12. The licensee reported 12 separate events of personnel entering high radiation areas without required monitoring devices and/or job coverage by a health physics technician. Prior to identification of this item by the NRC, the licensee, on January 4, 1988, required each station department head to provide a specific department action plan to improve personnel performance in RWP compliance. Access to the high radiation areas were administratively controlled by issuance of an RWP. The inspector reviewed the action plans and noted that implementation of the action plans began in January 1988. In discussions with health physics supervision and technicians, the inspector verified that no recurrence of failure to comply with high radiation area entry requirements have occurred since implementation of the corrective

actions. Failure of personnel to wear the monitoring devices specified in T.S. 6.12 or to be accompanied by a qualified HP technician was identified as an apparent violation of T.S. 6.12. However, it was determined that the violation met this criteria outlined in the NRC Enforcement Policy, 10 CFR 2, Appendix C and would be considered licensee identified (50-338,339/88-18-05).

During tours of the radwaste and reactor auxiliary building, the inspector verified that areas were properly posted.

4. Internal Exposure Control and Assessment (83725)

a. Engineering Controls

10 CFR 20.103(b)(1) requires that the licensee use process or other engineering controls, to the extent practicable, to limit concentrations of radioactive materials in the air to levels below those which delimit an airborne radioactivity area as defined in 10.203(d)(1)(ii).

During plant tours, the inspector observed various engineering controls to limit the concentrations of airborne material. These included the use of ventilation systems equipped with high efficiency filters and containment enclosures.

No violations or deviations were identified.

b. Respiratory Protection

The licensee was required by 10 CFR 20.103, 20.201(b), 20.401, and 20.403 to control intakes of radioactive material, assess such intakes, and keep records of and make reports of such intakes.

The inspector verified that the licensee issues respirators for use after verifying the users training and qualifications for the type of respirator issued, the date of last annual medical review, the users respirator fit testing date, and the users total maximum permissible concentration-hours in the last seven days. The licensee hand washes each respirator after use and verifies that there is no smearable radioactive contamination on the respirator and there is also no fixed radioactive material greater than 0.2 mr/hr. The inspector determined that persons authorized to repair respirator equipment, such as air regulators, were trained and qualified. The inspector toured the respirator issuance and repair areas and determined that respirators needing repair were separated from those stored for issue.

The licensee does not have a separate plant breathing air system for use with supplied air respirators. The licensee has used supplied air hoods with breathing air supplied by a vendor on site from a compressor and air tube trailer, for work on steam generators. The

vendors procedures for the setup and operation of the breathing air system require that the breathing air meet Grade D breathing air and conform with the Compressed Gas Association Specification G-7.1 for Type 1, Class D gaseous air. The vendors procedure describes how the diesel air compressor and backup tube trailer are operated. The procedure also requires that the supplied air system be monitored at all times while the system is in use; however, the detection of carbon monoxide entering the air system is the only air quality parameter addressed in the procedure.

The inspector reviewed a memorandum dated March 21, 1988, from the Director of Corporate Health Physics to the licensee's purchasing organization. The memorandum requested the certification records of breathing air quality be supplied whenever a compressor for breathing air or breathing air in cylinders were supplied to the station. Since the licensee's vendor did not have the breathing air certification onsite, the inspector was unable to verify that the air used for supplied air hoods met the requirements for Grade D breathing air. A review of breathing air quality certifications to be supplied by the vendor, will be examined in subsequent inspections and is tracked as IFI 50-338/88-18-02. The inspector verified that the pressure gauges utilized on air distribution systems for breathing air were calibrated and treated as measuring and test equipment.

No violations or deviations were identified.

c. Internal Assessment

The inspector reviewed licensee procedure Whole Body Counter Calibration-Bed/ND6620, dated October 1, 1985. The inspector reviewed the latest calibration records. The inspector verified that the whole body counter had been properly calibrated in accordance with licensee procedures and reviewed the licensee's source data. The inspector determined that two individuals had been exposed to more than 2 MPC-hours in one day but that no individual had been exposed to 10 MPC-hours in any seven (7) days.

No violations or deviations were identified.

5. Control of Radioactive Materials and Contamination; Surveys and Monitoring (83726)

a. Surveys

During plant tours, the inspector examined radiation levels outside selected rooms and cubicles in the auxiliary building. The inspector performed independent radiation level surveys and compared the results with licensee survey results. The inspector's survey readings were comparable to the licensee survey results.

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as: (1) may be necessary for the licensee to comply with the regulations in 10 CFR Part 20; and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

T.S. 6.8.1 requires written procedures to be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A of 1978, requires written procedures for contamination control.

Licensee procedure HP.8.0.40, Contamination Surveys, requires that loose surface contamination on items to be released for unrestricted use be less than 1,000 dpm beta gamma activity and less than 20 dpm alpha measured on a dry smear wiped over 100 centimeters square (cm^2) of a respective portion of the item's surface. The procedure also requires that total contamination on any item (fixed plus removable contamination) be less than 5,000 dpm/100 cm^2 and that the highest radiation level shall not exceed 100 counts per minute above background measured with a thin window GM detector (HP-210 or equivalent detector probe).

The information below was developed through review of records and discussions with licensee representatives.

On September 28, 1987, the licensee surveyed items/boxes of tools and cutting equipment for release and shipment to the equipment's owner. No survey record for the equipment could be produced by the licensee. The equipment was transferred by the licensee to the owner's warehouse in Fredericksburg, Virginia. A box of equipment containing Flange Facing Tools was subsequently shipped by the equipment owner to Farley Nuclear Plant via the owner's warehouse in Atlanta, Georgia, on October 12, 1987. The tools, a Flange Facer Arm, Drive Motor Assembly, and a Hand Lathe Stop were backup tools for turbine generator work at Farley and were never used. On October 18, 1987, the equipment was surveyed for shipment at Farley and loose surface contamination up to 2,317 dpm/100 cm^2 and up to 25,000 dpm/scan of fixed contamination was found. On October 20, 1987, the owner's warehouse in Atlanta was surveyed by the State of Georgia and found free of contamination. On October 22, 1987, the equipment owner had a survey performed at the Fredericksburg, Virginia warehouse and found 3 of 17 boxes of equipment shipped from North Anna contaminated with up to 2,390 dpm/100 cm^2 removable and 5,000 dpm fixed contamination. The three boxes of equipment were shipped as radioactive, low specific activity, to North Anna for further evaluation and possible decontamination. The office and warehouse areas were also surveyed and determined to be free of contamination. Upon notification of the event by Farley plant personnel, the licensee requested Farley Nuclear Plant to ship the subject box of contaminated tools back for further evaluation and possible

decontamination. The licensee listed possible causes for the incident: (1) a thorough enough survey was not performed or the relatively high background at the frisking location (250-300 cpm) may have been a contributing factor, or (2) the equipment was not surveyed at all due to a misunderstanding during a turnover of technicians surveying equipment for unrestricted release. If the survey was performed, no written documentation of the survey was maintained, nor was it required by the licensee's procedures. Failure to adequately survey material being released for unrestricted use, was identified as an apparent violation of 10 CFR 20.201(b) and T.S. 6.8.1 (50-338/88-18-03, 50-339/88-18-03).

b. Area and Personnel Contamination

The inspector reviewed the records for personnel contaminations in 1987, and for the first half of 1988. The licensee had 1,531 personnel contamination events in 1987, and 151 for the first half of 1988. The licensee radiologically controlled 105,400 ft.² of area that included the reactor auxiliary building, fuel, safeguards, decontamination waste solids and clarifier buildings. The total area contaminated as of June 1988, was 13,348 ft² or 12.7%.

The inspector noted on tours of the area that the majority of friskers were in areas with background readings of 200 to 400 counts per minute (cpm). As an example, both the RM-14 friskers at the truck bay and at the auxiliary building control point had backgrounds greater than 200 cpm. The inspector discussed with licensee management the problem of assessing contamination levels with the high background and the increased probability of low levels of contamination being released from the site. The licensee stated that the high background on RM-14 friskers would be reevaluated. The inspector notified the licensee that this would be reviewed during subsequent inspections and would be tracked as IFI 50-338/88-18-04.

The inspector also discussed recent changes to the contamination control program in that the licensee now requires shoe covers to be worn when entering clean areas of the reactor auxiliary building. This has the potential for reducing personnel contamination events but increases the amount of laundry waste to be processed and does not address the fundamental problem of not maintaining areas of the plant free of loose surface contamination to the maximum extent possible.

To minimize hot particle personnel contaminations and increase personnel contamination awareness, the licensee has addressed the issue of hot particle contamination with all workers at the station. Health physics technicians have been given training in detection and handling of hot particles and special areas have been identified throughout the plant as potential hot particle areas. Radiation Work Permits require that paper suits be worn over normal protective clothing to minimize the transfer of hot particles when protective

clothing is laundered. Also, protective clothing reading greater than 50,000 dpm after laundering are discarded.

c. Postings, Labels and Controls

The inspector reviewed discrepancy report no. 88-220 regarding three rotometers (mechanical test equipment used to measure air flow) stored outside of radiologically controlled areas. On March 7, 1988, health physics discovered contamination on a rotometer to be cleared from the radiologically controlled area. The person with the rotometer informed health physics that while in the RCA the item could not have become contaminated since it was never used or left his hand. Upon surveying the storage location of other rotometers, health physics found from 1,000 dpm to 260,000 dpm fixed contamination on two other rotometers. The rotometers were stored in a cabinet in the technical support center, a clean area outside of the radiologically controlled area of the plant. The licensee was unable to determine how the contaminated rotometers were removed from the radiologically controlled area.

Failure to properly survey and control the contaminated rotometers was identified as a second example of an apparent violation of 10 CFR 20.201(b) and T.S. 6.8.1 (50-338/88-18-03, 50-339/88-18-03).

The inspector surveyed selected areas outside of the radiologically controlled area with a RM-14/HP-210 frisker and did not locate any contaminated material.

6. Solid Waste (84722)

10 CFR 20.311(d)(1) requires that any generating licensee who transfers radioactive waste to a land disposal facility prepare all waste so that the waste is classified according to 10 CFR 61.55 and meets the waste characteristics requirements in 10 CFR 61.56.

The inspector reviewed radioactive waste classification documentation for selected radioactive waste shipments and determined that the waste had been properly classified and met the waste characteristics requirements of 10 CFR 61.

The inspector discussed with licensee representatives radioactive waste volume reduction. The licensee provides green and yellow waste containers in the auxiliary building for sorting of potentially clean and contaminated waste at its point of origin. Potentially clean waste was removed from the green containers in the radiologically controlled area and placed in the volume reduction and radwaste segregating facility. The potentially clean waste was surveyed on a belt driven automatic monitor. If the waste was clean it was placed in a bag monitor and released to the county burial site upon meeting the survey release requirements. Yellow trash was placed in 55 gallon drums and compacted for shipment to a vendor with super compactor capabilities.

The licensee has recently approved the construction of a new radioactive waste processing facility and plans are for the facility to be operational in 1990.

No violations or deviations were identified.

7. Transportation of Radioactive Material (86721)

Review of Radioactive Material Shipping Records

10 CFR 71.5 requires that licensees who transport licensed material outside the confines of its plant or other place of use, or who deliver licensed material to a carrier for transport to comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 170 through 189.

The inspector reviewed the records of selected shipments of radioactive material performed in 1987. The shipping manifest examined were prepared consistent with 49 CFR 170-189 requirements and the radiation and contamination survey results were within the limits specified for the mode of transport and shipment classification.

No violations or deviations were identified.

8. Licensee Actions on Previously Identified Inspection Findings (92701, 92702)

- a. (Closed) Violation 50-338/339/87-14-01: Failure to assess whole body dose through a tissue equivalent absorber of 300 milligram per square centimeter (mg/cm^2) or to shield the lens of the eyes with material having a density thickness of at least 700 mg/cm^2 as required on NRC Form 5.

The inspector verified that the corrective actions in the licensee's response letter to the NRC dated June 29, 1988, had been implemented.

The licensee took direct measurements of the source term in the steam generator Unit 1, on August 30, 1987, with modified TLDs. The measurements formed the basis of a lens-of-the-eye correction factor which was incorporated in the personnel dosimeter algorithm. The inspector determined that the licensee has a procedure to evaluate the dose delivered to lens of the eye. The same procedure will be used to adjust the algorithm when the steam generators for Unit 2 are opened. Health Physics Procedure 3.1.2.1, Whole Body Beta Dose Response of Thermoluminescent Dosimeter Badge, was developed and implemented to determine if adjustments to the algorithm are necessary each time the steam generators are opened in the future.

- b. (Closed) Violation 50-338,339/87-30-01: Failure to maintain quarterly occupational exposures to individuals in restricted areas to less than 7.5 rem to the skin of the whole body. The inspector

verified that the licensee corrective actions in response letter to the NRC, dated November 25, 1987, had been implemented. To minimize the potential for hot particle skin contaminations, the licensee reduced the contamination limits for clothing after laundering, installed an automatic laundry monitor, provided hot particle awareness training to all site personnel and specific training for health physics technicians and laundry personnel, developed a radiological work practice for hot particle work, and developed a cleanliness control procedure for work in open systems to contain and minimize the spread of hot particles.

- c. (Closed) Violation 50-338,339/87-30-02: Failure to adhere to protective clothing requirements specified on RWP No. 87-2312. The inspector verified that the corrective actions specified in the licensee's letter to the NRC dated November 25, 1987, had been implemented. The inspector determined that a series of meetings were held with all station personnel regarding RWP compliance and hot particle and contamination awareness. Health physics personnel are required to meet the same protective clothing requirements as are the workers. If clothing requirements are different for the health physics technician the requirements will be specified on the RWP.
- d. (Closed) Violation 50-338/339/87-30-03: Failure to perform adequate personal surveys. The inspector verified that the corrective actions specified in licensee's letter dated November 25, 1987, had been implemented. The inspector reviewed procedures and determined that health physics procedure 6.1.40, Attachment 5 was amended to require that all personnel, upon exiting a contaminated area, were to perform a whole body frisk at the nearest frisker and proceed directly to the PCM-1B monitors at the control point exit of the radiologically controlled area. Each step-off pad has a sign posted stating to proceed directly to the final frisk point after performing a frisk at the nearest frisker.
- e. (Closed) Unresolved Item 50-338,339/88-02-04: Discrepancy reports regarding improper control and unauthorized personnel entry to high radiation areas. See Paragraph 3.b.
- f. (Closed) 87-FRP-01: Followup on Licensee's Program for Removing/Defacing Radiation Markings on Clean/Unused Equipment Released for Unrestricted Use. The inspector discussed the licensee's policy for disposal of 55 gallon drums. The inspector determined that the licensee does throw away damaged drums and sells some to employees. However, the licensee representatives stated that drums that were yellow in color were compacted when damaged and never released for general public use.

9. IE Information Notice ('EN) (92717)

The inspector determined that the following Information Notices had been received by the licensee, reviewed for applicability, distributed to

appropriate personnel and that action, as appropriate, was taken or scheduled.

IEN 87-31, Blocking, Bracing and Securing of Radioactive Materials Packages in Transportation

IEN 87-37, Control of Hot Particle Contamination at Nuclear Plants

10. Exit Interview

The inspection scope and results were summarized on June 10, 1988, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. Proprietary information is not contained in this report.

<u>Item Number</u>	<u>Description and Reference</u>
338/88-18-01	IFI - Review SRD response/calibration records to ensure that potentially damaged SRDs are response checked prior to reissuance.
338/88-18-02	IFI - Review breathing air quality certifications for vendor supplied air.
338,339/88-18-03	Violation - Failure to adequately survey material being released for unrestricted use.
338/88-18-04	IFI - Review high background on RM-14 friskers.
338,339/88-18-05	Licensee Identified Violation - High radiation area controls

Licensee management was informed that the items discussed in Paragraph 8 were considered closed.

During a telephone conversation on July 18, 1988, between R. B. Shortridge of the NRC, and A. H. Stafford of Virginia Electric and Power Company, the licensee was informed that the failure to properly survey and control contaminated rotometer would be a second example of violation 10 CFR 20.201(b) and T.S. 6.8.2 (50-338, 339/88-18-03).

During a telephone conversation on August 5, 1988, between R. B. Shortridge of the NRC, and A. H. Stafford and M. L. Bowling, Virginia Electric and Power Company, the licensee was informed that the apparent violation for failure to adequate control access to high radiation areas would be considered licensee identified.