

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 9, 1988

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 88-549
NAPS/JHL
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

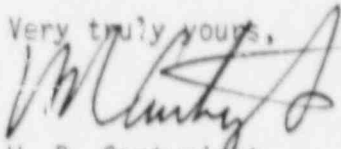
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/88-18 AND 50-339/88-18
REPLY TO A NOTICE OF VIOLATION

We have reviewed your letter of August 10, 1988 which referred to the inspection conducted at North Anna between June 6 - 10, 1988 and reported in Inspection Report Nos. 50-338/88-18 and 50-339/88-18. The response to the Notice of Violation is provided in the attachment.

We have no objection to this correspondence being made a matter of public record. If you have any further questions, please contact us.

Very truly yours,



W. R. Cartwright
Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W.
Suite 2900
Atlanta, Georgia 30323

Mr. J. L. Caldwell
NRC Senior Resident Inspector
North Anna Power Station

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RESPONSE TO THE NOTICE OF VIOLATION REPORTED DURING THE
NRC INSPECTION CONDUCTED BETWEEN JUNE 6 - 10, 1988
INSPECTION REPORT NOS. 50-338/88-18 AND 50-339/88-18

NRC COMMENT

During the Nuclear Regulatory Commission (NRC) inspection conducted on June 6-10, 1988, a violation of NRC requirements was identified. The violation involved an inadequate survey to identify radioactive material as required by 10 CFR 20.201. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR 2, Appendix C (1986), the violation is listed below.

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.

Technical specification 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, 1978, requires written procedures for contamination control.

Licensee procedure HP-8.0.40, Contamination Surveys, requires that loose surface contamination levels on items being released for unrestricted use be less than 1,000 disintegrations per minute per 100 square centimeters (dpm/100 cm) beta-gamma activity and less than 20 dpm/100 cm alpha. The procedure also requires that the total contamination (fixed and loose surface contamination) on any item be less than 5,000 dpm/100 cm 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).

Contrary to the above, the licensee failed to perform adequate contamination surveys of equipment prior to release of the equipment for unrestricted use in that:

- a. On September 28, 1987, equipment transferred to Power Cutting Incorporated for unrestricted use had loose surface contamination levels up to 2,317 dpm/100 cm and fixed contamination levels of 25,000 dpm/scan.
- b. On or before March 7, 1988, three rotometers, with fixed contamination levels up to 260,000 dpm/100 cm, were released from the facility for unrestricted use and stored outside the radiologically controlled area.

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

RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

2. REASON FOR THE VIOLATION

The violation was caused by performing inadequate radiological surveys.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A technical report evaluating the improper release of radioactive material from the site and recommending corrective actions to prevent recurrence was prepared by Health Physics. This report was reviewed and approved by the Station Nuclear Safety and Operating Committee (SNSOC). The following corrective actions from the report have been completed.

A "Yard Log" was established to document the survey of items that have left the RCA for unrestricted use and that are going to leave the protected area in vehicles. The "Yard Log" will document the use of a green release tag. The green release tag will signify that the material has been surveyed and found to be free from radiation and/or contamination and can be released for unrestricted use.

The Health Physics Technician Continuing Training Program was revised to incorporate lessons learned from the improper release of radioactive material.

The report was placed into required reading for appropriate Health Physics personnel.

Additional corrective actions were also implemented to prevent recurrence of the event.

A Health Physics Shift Instruction was issued, as a temporary measure until procedures could be revised, to reduce the maximum permissible background radiation limit in which equipment to be released for unrestricted use can be surveyed. The new background radiation limit is 200 counts per minute (cpm).

Health Physics procedures were revised to establish the 200 cpm maximum permissible background radiation limit in which equipment to be released for unrestricted use can be surveyed.

A Radiological Incident Report was written as a result of the inadequate survey of the three contaminated rotometers. The identified recommended corrective actions to prevent recurrence. This report was reviewed and approved by the SNSOC. The following corrective actions from the report have been completed.

The report was discussed with Health Physics Shift Supervisors, who then reviewed the report with their respective shift personnel to emphasize the cause of the event and associated corrective actions.

Station Administrative Procedure ADM-12.1, Measuring and Test Equipment Calibration Program, has been revised to clarify the requirements for disposition of measuring and test equipment (M&TE) that cannot be decontaminated.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Training will be provided to M&TE user's on the revision to ADM-12.1.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Training of M&TE user's on the revision to ADM-12.1 will be completed by October 31, 1988.