

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 29, 1979

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USNRC REGION I
ATLANTA, GEORGIA

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No.: 415
PO/FHT:baw
Docket No: 50-280
50-281
License No: DPR-32
DPR-37

Dear Mr. O'Reilly:

In response to Mr. J. T. Sutherland's May 15, 1979, letter requesting additional information in response to IE Inspection Report Nos. 50-280/79-9 and 50-281/79-10, Virginia Electric and Power Company hereby forwards a supplement to our April 20, 1979, letter. This supplement describes further steps taken in response to Item E of your March 28, 1979, Notice of Violation.

Very truly yours,

W.C. Stallings
C. M. Stallings
Vice President-Power Supply
and Production Operations

Attachment

cc: Mr. Albert Schwencer

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OFFICIAL COPY

SUPPLEMENTAL RESPONSE TO INFRACTION ITEM E
LISTED IN IE INSPECTION REPORT 50-280/79-9, 50-281/79-10

E. NRC Comment

As required by 10CFR20.203(f) (1) and 20.203(f) (2), each container of licensed material containing quantities greater than those listed in Appendix C of 10 CFR 20 shall bear a durable, clearly visible label identifying the radioactive contents and bear the radiation caution symbol described in 10 CFR 20.203(a) and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL." 10 CFR 20.203 (f) (3) specifies exceptions to the labeling requirements of 10 CFR 20.203(f) (1) and 20.203(f) (2).

Contrary to the above, on February 12 and 13, 1979 twelve 55-gallon drums in the Auxiliary Building containing contaminated materials were not labeled as stated above. Assuming typical activation products, and based on measured radiation levels, the inspector estimated that the drums contained activities ranging from 200 to 16,000 times 10 CFR 20 Appendix C activities. The exceptions specified by 10 CFR 20.203(f) (3) did not apply.

E. Response

The above information is correct as stated.

1. Corrective steps taken and the results achieved:

Each container (55-gallon drum, box, bag, etc.) of licensed material containing quantities greater than those listed in Appendix C of 10CFR20 bear the radiation caution symbol described in 10CFR20.203(a) and the words "CAUTION, RADIOACTIVE MATERIALS".

2. Corrective steps which will be taken to avoid further violations.

Health Physics personnel have been reinstructed in regard to labeling requirements of licensed material in excess of quantities specified in Appendix C of 10CFR20. Assistant Health Physics Supervisors will tour the restricted controlled areas at least daily to insure compliance.

3. The date when full compliance will be achieved:

Full compliance has been achieved.