

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 14, 1979

USNRC REGIONAL
ATLANTA, GEORGIA
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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. 399
PO/FHT:scj
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of May 18, 1979, in reference to the inspection conducted at Surry Power Station Units No. 1 and 2 on March 20-23, 1979, and reported in IE Inspection Report Nos. 50-280/79-14 and 50-281/79-20. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure.

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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ORIGINAL 6-14-79

RESPONSE TO VIOLATIONS
LISTED IN IE INSPECTION REPORT
NOS. 50-280/79-14
50-281/79-20

A. NRC COMMENT:

As required by license conditions 2(e) dated January 24, 1979, the health physics (HP) program and procedures for the steam generator replacement project (SGRP) shall be implemented. HP procedure 4, Radiation Work Permits (RWP)", Section A.1, states that an RWP is required for all work in containment structures and that RWP's be obeyed. RWP No. SGRP-79-109 dated March 20, 1979, for the removal of reactor coolant shield covers, limits work to the removal of shield covers by chipping only. It states any other work must be done under SGRP-79-108, which required tents. Neither RWP's authorized the removal of slag from the inside of pipes.

Contrary to the above, on the morning of March 21, 1979, individuals removed contaminated slag from the inside of the reactor coolant pipe in the basement of Unit 2 Containment without an RWP.

This is an infraction.

RESPONSE:

The above information is correct as stated.

(1) Corrective steps taken and results achieved:

The contaminated area associated with reactor coolant pipe slag removal was immediately roped off and properly posted. An air sample was taken in the area with negative results. No personnel were found to be contaminated as a result of slag removal. The contaminated area was decontaminated to satisfactory limits. Personnel involved in the slag removal operation were informed of the violation and the associated supervisors were also notified.

(2) Corrective steps taken to avoid further noncompliance:

A Health Physics monitor is assigned to stay in the area during slag removal operations, and all slag removal is performed in a herculite tent with a contained ventilation system. RWP's associated with slag removal are strictly adhered to. A step by step outline is now utilized for each piece of reactor coolant pipe placed in the tent for slag removal.

(3) The date when full compliance will be achieved:

Full compliance has been achieved as of 3/22/79.

B. NRC COMMENT

As required by 10 CFR 20.401, records of surveys required by 10 CFR 20.201(b) must be maintained. 10 CFR 20.201(b) required that records of "reasonable efforts" made by the licensee to determine individuals' previous occupational dose in accordance with 10 CFR 10.102(c) must be maintained.

Contrary to the above, records of such "reasonable efforts" were not maintained for new contractor employees during the period January 9, 1979 through February 21, 1979.

This is a deficiency.

RESPONSE:

The item is correct as stated.

- (1) Corrective steps which have been taken and the results achieved:

The licensee has taken over the responsibility of sending the request for previous exposure records. Previously the prime contractor was sending the letters, and copies were being lost/misplaced. This appears to have alleviated the administrative shortcomings which were apparent.

- (2) Corrective steps which will be taken to avoid further noncompliance:

The licensee will continue to send the requests for previous exposure, a thorough review of all personnel exposure records will be conducted and those individuals' records with no exposure history available will be segregated. Individuals in this category will be limited to 1000 mrem/calendar quarter until a reasonable effort has been made.

- (3) The date when full compliance will be achieved:

Full compliance has been achieved.

APPENDIX B

NOTICE OF DEVIATION

Virginia Electric and Power Company

License No. DPR-37

NRC COMMENT

Based on the results of the NRC inspection conducted on March 20-23, 1979, certain of your activities appear to deviate from your commitments to the Commission, as indicated below.

A. Table 6-1 of the "Steam Generator Replacement Program Manual" lists specific measures implemented to maintain radiation doses as low as reasonably achievable including:

1. Establishing low radiation zones in containment for personnel to use for rest breaks.
2. Minimizing the streaming of radiation by installing shielding such as plugs in open-ended pipe lines following cutting.
3. Performing preoperational briefings to instruct personnel of the requirements of a work package.
4. Assuring that the number of persons who must enter high radiation areas or contaminated areas be held to a minimum, that the period of time persons must remain in these areas be minimized and that the magnitude of the potential dose be maintained to the lowest levels commensurate with other considerations.
5. Keeping zones with high dose rates as small as possible considering the work requirements.

Contrary to the above,

1. On March 21, 1979, two to six individuals waited in 5 to 50 mrem/hour zones for up to four hours awaiting the use of the polar crane to move reactor coolant piping into an electrolysis tank. They stayed in this area because they were told that the crane would be available within thirty minutes all morning long.
2. The shield plugs of a section of reactor coolant piping, were removed at approximately 0300 on March 21, 1979, but the pipe could not be placed in the electrolysis tank until approximately 1500 on March 21, 1979. The premature removal of the shield plugs resulted in radiation levels of 10 rem/hr at the open end of the pipe and 50 mrem/hr 10 feet away. The cart on which the pipe was stored had to be moved by hand approximately 40 feet after the shielding was removed.

3. On March 21, 1979, three workers were told to report to the basement of containment to await instruction concerning their assignment. The workers waited in an area with radiation levels of 5 to 10 mrem/ hr for approximately 30 minutes before being briefed as to the specifics of the work package.
4. On March 22, 1979, three workers spent at least two hours searching containment in 5 to 10 mrem/hour fields, attempting to locate fittings for pipe which they were to run.
5. From March 20-23, 1979, from one to six individuals frequently waited for 5 to 15 minutes in radiation fields 10 to 20 mrem/hour outside C cubicle near the RHR platform. A low-dose area was approximately fifty feet down the corridor.

RESPONSE:

The above information is correct as stated.

- (1) Corrective steps which have been taken and the results achieved:

All personnel were reinstructed to wait in designated rest areas (3 mR/hr.) when not able to perform a designated task associated with higher radiation areas. Reinstructed Vepco and Daniel supervisors to plan work and have necessary equipment on hand to perform job prior to entering work areas in No. 2 containment. Health Physics monitor in area informs personnel not to loiter in containment work areas. Informed Daniel and Vepco supervisors to read RWP's (located in log room) prior to entry into containment.

- (2) Corrective steps which will be taken to avoid further noncompliance:

The above actions will preclude further noncompliance.

- (3) The date when full compliance will be achieved:

Full compliance has been achieved.