

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 20, 1981

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. 205A
NO/RMT:ms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

In our response to your letter of March 19, 1981 which forwarded Inspection and Enforcement Report Nos. 50-280/81-04 and 50-281/81-04 we stated that a response to the concern referenced in Paragraph 4 would be forthcoming in a follow-up letter. The purpose of this letter is to provide that information as requested. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Should you require any further information, please contact this office.

Very truly yours,

B. R. Sylvia
B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

City of Richmond
Commonwealth of Virginia
Acknowledged before me this 20th day of Apr, 1981

Anna C. Moore
Notary Public

My Commission expires: 2-26, 1985

SEAL

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

8105260698

SUPPLEMENTAL
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-280/81-04 AND 50-281/81-04

Reference the concern expressed in paragraph 4 of the cover letter to subject inspection, the following is our response:

On January 16, 1981, the Station Manager issued a memorandum to all Vepco and Contractual personnel requiring a safety evaluation be performed by the Engineering staff whenever temporary shielding is requested on safety related piping. In order to document any requests and subsequent actions, the following administrative controls have been implemented.

- (1) All requests for temporary shielding shall be originated by the Supervisor-Health Physics using the form generated specifically for this purpose. Each request shall be dated and identified by number with the original sent to the Supervisor-Engineering Services and a copy retained in the H.P. office. Note that the form will list the line and/or component number, location, type shielding required (thickness, quantity, etc., if known) and any general comments concerning the request.
- (2) Engineering shall receive each request, logging the date received and number of each request. The log shall specify the current disposition (working, cancelled, completed, etc.) of each request. Engineering shall be responsible for analyzing the request to determine if, in fact, the shielding should and can be installed. A safety evaluation shall be documented for each request regardless of the final disposition. The analysis shall be routed to the Supervisor-Health Physics with a copy retained in the Request Log. No shielding shall be installed without a completed safety evaluation stating that such shielding does not constitute a safety hazard.

Engineering is investigating the possibility of generating a generic shielding procedure for use on both safety-related and non-safety related installed piping. The intent of the procedure would be to allow workers in the field to install shielding in accordance with predetermined specifications stipulated in the procedure. Situations not covered by the procedure would be handled by the shielding request system noted above. Preliminary results of this investigation are expected to be complete by June 1, 1981.

In regard to the 50 shielding requests submitted during the period of December 1979 to January 1980, the following actions is planned: The requests will be returned to Station Engineering from Corporate Engineering such that each request can be clarified and re-evaluated. Clarification will consist of specifying line numbers, more accurate locations, and more detailed description of the shielding required. Following clarification, each request will be re-evaluated to determine if the request is still valid. For those requests which are determined valid, they will be reinitiated, utilizing the system previously described. For those determined as not necessary, the request will be cancelled with a memo stating the justification for cancellation.