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April 3, 1985



VIRGINIA POWER

Dr. J. Nelson Grace  
Regional Administrator  
Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30323

Serial No. 85-175  
NO/HLM:dn  
Docket Nos. 50-280  
50-281  
Licensee Nos. DPR-32  
DPR-37

Gentlemen:

We have reviewed your letter of March 5, 1985 in reference to the inspection conducted at Surry Power Station on February 11-15, 1985, and reported in IE Inspection Report Nos. 50-280/85-02 and 50-281/ 85-02. Our response to the specific violation is attached.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power has no objection to this inspection report being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

f W. L. Stewart

Attachment

cc: (w/attachment)

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

Mr. D. J. Burke  
NRC Resident Inspector  
Surry Power Station

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RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/85-02 and 50-281/85-02

VIOLATION

Technical Specification 6.1.B.1 requires each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. ANSI N18.1-1971, 4.3.2 requires a supervisor to have a minimum of four years of experience in the craft or discipline he supervises. The ANSI standard defines a supervisor as a person principally responsible for directing the actions of operators, technicians or repairman. First line supervisors are included in this category.

Contrary to the above, the minimum qualifications of ANSI N18.1-1971 were not met in that the Supervisor of Health Physics was promoted to his current position with less than four years experience as required.

This is a Severity Level V Violation (Supplement IV).

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated, however there are mitigating circumstances which are described below.

(2) REASONS FOR VIOLATION

The violation occurred because, in the judgment of station and corporate management, the fourteen years of nuclear power station experience of the individual appointed as Supervisor of Health Physics more than adequately satisfied the ANSI 18.1-1971 requirement. This experience included

six years of supervisory duties, during which he trained Senior Reactor Operators and served as Operations Shift Supervisor. Because of the nature of his duties, particularly as Shift Supervisor, he gained in-depth knowledge of radiological protection and procedures.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Even though station management is confident that the Supervisor of Health Physics possesses adequate experience, a survey was conducted to assess the extent of direct health physics experience resident in the organization. It was found that individuals reporting directly to the Supervisor had an average of eight years of nuclear power station experience.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

We believe that this level of experience within the organization is adequate to provide proper support to the Health Physics Department and that no further corrective action is necessary.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

As outlined in the preceding paragraphs, the extensive operational and supervisory experience of the Supervisor of Health Physics and his immediate staff is considered sufficient to fulfill the requirements of the ANSI Standard. We consider that full compliance has been achieved.