

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 22, 1986

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

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

Serial No. 86-641
NO/WDC:pms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Dr. Grace:


VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT NOS. 1 AND 2
NRC INSPECTION REPORT NOS. 50-280/86-21 AND 50-281/86-21

We have reviewed your letter of September 22, 1986, in reference to the inspection conducted at Surry Power Station on August 18-22, 1986, and reported in Inspection Report Nos. 50-280/86-21 and 50-281/86-21. Our response to the Notice of Violation is addressed in the attachment.

We have no objection to this inspection report being made a matter of public disclosure.

If you have any further questions, please contact us.

Very truly yours,


W. L. Stewart

Attachment

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PDR ADOCK 05000280
Q PDR

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cc: Mr. Lester S. Rubenstein, Director
PWR Project Directorate No. 2
Division of PWR Licensing-A

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

Mr. Chandu P. Patel
NRC Surry Project Manager
PWR Project Directorate No. 2
Division of PWR Licensing-A

RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED ON AUGUST 18 - 22, 1986
INSPECTION REPORT NOS. 50-280/86-21 AND 50-281/86-21

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on August 18-22, 1986, a violation of NRC requirements was identified. The violation involved failure to establish adequate controls to assure that radioactive waste shipping casks (liners) are at least 85% capacity when transporting for burial. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Technical Specification 6.4.B states that radiation control procedures shall be provided and that the radiation protection program shall be organized to meet the requirements of 10 CFR 20. Technical Specification 6.4.D states that procedures described in 6.4.B shall be followed.

10 CFR 20.311(d)(1) requires that all wastes be prepared to meet the waste characteristics requirements in 10 CFR 61.56.

10 CFR 61.56(b)(3) requires that void spaces within the waste and between the waste must be reduced to the extent practicable.

State of South Carolina License No. 097, Amendment 41, License Condition 39(C), issued to Chem Nuclear Systems, Inc. (CNSI) for receipt and burial of radioactive material states that shipping containers must be packaged to at least 85% capacity.

Contrary to the above, the licensee failed to establish adequate procedures to assure that radioactive waste shipping containers, when shipped for burial, were filled to at least 85% capacity, in that, on January 22, 1986, the licensee shipped a radioactive material waste shipment to CNSI for burial (Shipment No. B86-1A) with the shipping container (liner) filled to 78% of capacity.

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

RESPONSE:

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

2. REASONS FOR THE VIOLATION:

The violation resulted from procedural deficiencies which failed to ensure that the solidified waste liner was filled to at least 85% capacity.

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

The liner was filled to at least 85% capacity and returned to CNSI for burial. Procedure OP-20.4, "Resin Solidification", was revised to require additional waste level monitoring instrumentation and/or positive visual monitoring of waste levels inside solidification liners. The Station Process Control Program was revised to specifically address the Barnwell License requirements regarding void spaces in solidified wastes to ensure more adequate control of vendor supplied solidification services. Additionally, station personnel involved in waste solidification and shipping were reinstructed in license requirements related to waste stabilization.

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

No further corrective actions are deemed necessary.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on March 21, 1986, when Procedure OP-20.4 was revised.