

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

June 25, 1987

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Serial No. 87-329  
NO/WDC:pms  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNITS 1 AND 2  
NRC INSPECTION REPORT NOS. 50-280/87-12 AND 50-281/87-12

We have reviewed your letter of May 26, 1987, in reference to the inspection conducted at Surry Power Station on May 4-8, 1987 and reported in Inspection Report Nos. 50-280/87-12 and 50-281/87-12. 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*  
W. L. Stewart

Attachment

cc: U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
Suite 2900  
Atlanta, Georgia 30323

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

8707020270 870625  
PDR ADOCK 05000280 PDR  
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*Add: AEOD/DOA/IRB 1 1*  
*NRR/DREP/EPB 1 1*  
*Ltr Ench*

RESPONSE TO NOTICE OF VIOLATION  
ITEM REPORTED DURING NRC INSPECTION  
CONDUCTED ON MAY 4-8, 1987  
INSPECTION REPORT NOS. 50-280/87-12 AND 50-281/87-12

NRC COMMENT:

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 4-8, 1987, a violation of NRC requirements was identified. The violation involved a failure to provide training to members of the emergency organization in accordance with the Emergency Plan. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of 10 CFR 50, Appendix E and the Planning Standards of 10 CFR 50.47(b). 10 CFR 50.47(b)(15) requires that radiological emergency response training be provided to those who may be called upon to assist in an emergency. 10 CFR 50, Appendix E, Section IV.F requires that specialized initial and periodic retraining be provided for nine categories of emergency personnel.

Section 8.3 of the Surry Emergency Plan requires that emergency response personnel be instructed annually covering their functional responsibility during an emergency. The specific training requirements for each functional position is detailed in Table 8.1, "Emergency Preparedness Training."

Contrary to the above, all personnel expected to respond in the event of an emergency have not been trained in accordance with the Emergency Plan training requirements. A random sampling of training records for approximately twenty (20) individuals indicated that eight (8) had either not received initial specialized emergency training or had not been retrained within the applicable time frame. The individuals lacking the required training held both primary and alternate positions in the emergency organization and were typically the mid-level management in the normal plant organization.

This is a Severity Level IV violation (Supplement VIII).

RESPONSE:

1. Admission or denial of the alleged violation:

The violation is correct as stated.

2. Reason for the violation:

The violation was the result of inadequately monitoring the required training for those individuals designated as emergency response personnel. Additionally, it has been determined that Table 8.1 of the Surry Emergency Plan does not accurately specify training required for certain functional areas of responsibility during an emergency.

3. The corrective steps that have been taken and the results achieved:

Table 8.1 of the Surry Emergency Plan has been reviewed and appropriate training has been identified. The corresponding job title list and the respective training requirements are being revised. A list designating individuals as emergency response personnel has been compiled which indicates when each element of training was last received for each individual. The training records of those individuals have been reviewed and individuals delinquent in training have now been trained or retrained in accordance with the requirements identified in this recent review.

4. The corrective steps that will be taken to avoid further violations:

The list of designated emergency response personnel will be updated on a quarterly basis to reflect the current status of each individual's qualifications. Section 8 of the Surry Emergency Plan will be revised to describe the list of designated emergency response personnel and to programmatically maintain the status of their training information.

5. The date when full compliance will be achieved:

Personnel expected to respond to an emergency have been either trained or retrained as appropriate. The Surry Emergency Plan will be revised by July 31, 1987 to accurately reflect the training requirements for designated emergency response personnel.