

REGULATORY DOCKET FILE COPY

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

December 6, 1977



Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region II - Suite 313  
230 Peachtree Street, Northwest  
Atlanta, Georgia 30303

Serial No. 519/111177  
PCRM/TAP:wbh  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

This is in response to your letter of November 11, 1977, in reference to the inspection conducted at Surry Power Station on October 4-7, 1977 and reported in IE Inspection Reports 50/280/77-29 and 50-281/77-29.

We have reviewed your letter and the enclosed inspection report. Our responses to the specific non-compliance items are contained in the attachment to this letter.

Our plans to improve the effectiveness of our management control systems will be described after further review is completed. This will be forwarded by January 1, 1978.

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

Very truly yours,

*J. M. Stallings*

J. M. Stallings  
Vice President-Power Supply  
and Production Operations

Attachment

cc: Mr. Robert W. Reid ✓

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RESPONSE TO NON-COMPLIANCE ITEM REPORTED IN  
IE INSPECTION REPORT NO. 50-280/77-29 AND 50-281/77-29

NRC COMMENT

- A. Technical Specification 6.4.D requires, in part, that radiation control procedures be followed, Health Physics Procedure No. HP 3.4-2 limits fixed contamination of respirators ready for reissue to less than 0.2 mrem/hr.

Contrary to the above, on October 5, a survey of seven respirators ready for reissue revealed three with fixed contamination levels ranging from 0.3 to 0.4 mrem/hr above background.

RESPONSE

- A. CORRECT AS STATED

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

All respirators were checked to insure that their fixed contamination levels were less than .2 mrem/hr. An investigation of the cause of this violation has revealed that the respirators in question were probably placed in plastic bags by the contract labor force working in the laundry area without being properly surveyed. As a result of this probable cause, respirators are now taken to a separate, low background area to be surveyed and prepared for issue by Vepco Health Physics personnel only. During maintenance periods, where contract laborers are hired to assist in the laundry area, they are not allowed to participate in respirator surveys or packaging. As an additional administrative check of the respirator program, a plant Health Physicist has been assigned to do a daily random check of respirators ready for issue for contamination levels and to document his results. The Results Achieved are to provide greater assurance the respirators ready for issue are within the established contamination limits.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER NON-COMPLIANCE:

A separate room is being constructed to be used solely for respirator cleaning and storage. This room will be manned by Health Physics personnel and will provide much more stringent controls over respirator cleaning, surveying, and reissue. Material is on site and the room will be in use by early 1978.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

NRC COMMENT

- B. Technical Specification 6.4.D requires, in part, that radiation control procedures be followed. Health Physics Radiation Protection Manual Section 2.4.C includes procedures which require that a physician be immediately contacted if contamination is found in the eyes, mouth, or an open wound.

Contrary to the above, contamination was found in an employee's mouth on September 26 and no physician was contacted.

B. Response

CORRECT AS STATED

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

During the incident in question, in which an employee had been internally contaminated, the Health Physics Supervisor, after evaluation of the incident, had recommended to the Station Manager that medical attention was not necessary. It is felt that his evaluation was correct and the actual violation is that the Health Physics Supervisor did not receive approval from the Station Nuclear Safety and Operating Committee to deviate from an approved procedure (Health Physics Radiation Protection Manual). As a result of this incident, the applicable section of the Health Physics Radiation Protection Manual will be changed to state that a physician will be contacted if deemed necessary by the Health Physics Supervisor or Health Physicist. This change will be completed by December 30, 1977

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER NON-COMPLIANCE:

None

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

C. NRC COMMENT

Technical Specification 6.4.D requires, in part, that radiation control procedures be followed. Health Physics Radiation Protection Manual, Section 2.10.A.2 requires areas with smearable beta-gamma activity in excess of 220 disintegrations per minute (dpm) per 100 square centimeters to be roped off and posted.

Contrary to the above, surveys taken October 6 revealed two non-roped or posted areas with smearable activity of 450 and 900 dpm per 100 square centimeters.

C. ResponseC. CORRECT AS STATEDCORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The areas in question were decontaminated to a level less than 200 dpm per 100 square centimeters. The areas were adjacent to marked contaminated areas as discussed in the details section of the report. Daily contamination surveys are done to check the adequacy of barriers for contaminated areas. The daily contamination surveys of October 5 and October 6 had found these two areas and they were decontaminated. The intent of section 2.10.A.2 of the Health Physics Radiation Protection Manual is to rope off and post those areas which are greater than 220 dpm per 100 square centimeters and are not able to be decontaminated immediately. As a corrective action, the frequency of contamination surveys were increased during plant shutdown periods. Results achieved have been to further decrease the possibility of contaminated areas not being identified.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER NON-COMPLIANCE

Section 2.10.A.2 of the Health Physics Radiation Protection Manual will be changed to clarify its intent.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

December 30, 1977

D. NRC COMMENT

Technical Specification 6.4.B.1 requires, in part, that "the entrance to each radiation area in which the intensity of radiation is equal to or greater than 1000 mrem/hr shall be provided with locked barricades to prevent unauthorized entry into these areas".

Contrary to the above, the entrance to the Boron Evaporator Filter area (Gate No. 7) was found unlocked on October 6, 1977. The most recent survey performed (October 5) indicated radiation levels in this cubicle as high as 5000 mrem/hr.

D. ResponseD. CORRECT AS STATEDCORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The Operations Department has created a daily check list that is filled out by an operator on his plant tour. This check lists all the greater than 1R gates as to their as found, as left, and changed condition. Any discrepancies can be immediately corrected. The Health Physics Department has modified all of their applicable survey forms to include an initial block, stating that all greater than 1R gates are locked. In addition, the Station Manager has discussed this violation with all the station supervisors who have, in turn, met with their respective departments and emphasized to station personnel the seriousness of this violation. Results Achieved have been to significantly decrease the possibility of a greater than 1R gate being left open.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER NON-COMPLIANCE:

None

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.

E. NRC COMMENT

Technical Specification 3.7.E requires automatic functions operated from radiation monitor alarms to be as stated in Technical Specification Table 3.7-5. This Table requires the liquid waste effluent monitor to automatically shut discharge valves at alarm conditions with the alarm setpoint less than or equal to an effluent concentration of  $1.5 \times 10^{-3}$  uCi/cc.

Contrary to the above, on August 13, 1977, July 18, 1977 and October 27, 1976 the liquid waste monitor did not operate as specified, as demonstrated by isotopic analyses showing effluent concentrations in excess of the stated set point with no alarm trip occurring during the releases.

E. ResponseCORRECT AS STATEDCORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

An investigation of this violation indicates a conflict between Technical Specification 3.11.A and the liquid waste monitor setpoint given in Technical Specification Table 3.7-5. Corrective action has been a written directive to the Health Physics Technicians who perform the liquid waste isotopic analysis to not approve release of liquid waste if any one isotope has a value greater than  $1.5 \times 10^{-3}$  uCi/ml (excluding tritium). Results Achieved have been to eliminate the possibility of having a situation where the concentration of a single isotope could be greater than the liquid waste monitor trip setpoint.

CORRECTIVE STEPS TAKEN WHICH WILL BE TAKEN TO AVOID FURTHER NON-COMPLIANCE:

A Technical Specification change will be submitted to correct the value given in Technical Specification Table 3.7-5 for the liquid waste monitor alarm setpoint. This change request is being formulated at this time.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.