

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

July 28, 1983

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

Serial No. 393
NO/WDC:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of June 28, 1983 in reference to the inspection conducted at Surry Power Station between May 2 and May 4, 1983 and reported in IE Inspection Report Nos. 50-280/83-14 and 50-281/83-14. Our response to the specific infractions are attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this/these 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,

W. L. Stewart
W. L. Stewart

Attachment

cc: 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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USNRC REGION 2
ATLANTA, GEORGIA

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/83-14 AND 50-281/83-14

A. NRC COMMENT:

As a result of the inspection conducted on May 2-4, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations in 10 CFR 20, and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10 CFR 20.201(a) states that survey means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other source of radiation under a specific set of conditions. 10 CFR 20.101(a) states that no licensee shall possess, use, or transfer licensed material in such a manner as to cause any individual in a restricted area to receive in any period of one calendar quarter from radioactive material and other sources of radiation a total occupational dose in excess of the standards specified in the table following paragraph 20.101(a).

Contrary to the above, the requirements to conduct surveys to ensure compliance were not met in that an evaluation of the neutron dose received by individuals handling a neutron source or working in the vicinity of the source between February 26, 1983 and March 11, 1983 was not performed.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

(2) REASONS FOR VIOLATION:

The reason for the violation was determined to be inadequate procedural control related to issuance and use of sealed sources. Additionally, procedural requirements to evaluate and properly document doses received when handling neutron sources need to be strengthened to assure compliance.

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

Evaluations were performed to assess the extent of any doses received by personnel who handled or worked in the vicinity of the source between February 26, 1983 and March 11, 1983. These evaluations resulted in the assignment of additional radiation dose to five (5) health physics personnel and four (4) instrument technicians. The assigned doses ranged from 2 to 325 mrem to the extremities and from 2 to 195 mrem to the whole body. All individuals remained well within the limits specified in 10 CFR 20.101.

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

Procedures governing the use of sealed sources will be revised to require more stringent control and documentation over the issuance and return of these materials. These procedures will specifically address proper verification of sign-out/sign-in logs and return to storage. Additionally, special precautions and instructions will be included in the revised procedures to ensure proper evaluation of doses received when handling or working with neutron sources.

In the interim, written instructions have been issued to health physics personnel to ensure proper control and documentation of source usage.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved with regard to the evaluation of neutron doses to exposed individuals. The procedural modifications referred to above will be completed by August 15, 1983.

NOTICE OF DEVIATION

B. NRC COMMENT:

Based on the results of the NRC inspection conducted on May 2-4, 1983, certain of your activities appear to deviate from your commitments to the Commission as indicated below:

In telephone conversations on April 8 and April 11, 1983, between members of the Regional Office Staff and members of VEPCO Management and in an enforcement meeting held in the Regional Office on April 5, 1983, the licensee committed to complete an evaluation of beta radiation dose measurements. The licensee also committed to retain detailed beta radiation survey records to enable the resolution of discrepancies between dose measurements made with portable survey instruments and those made with thermoluminescent dosimeters until this evaluation was completed. The commitments were documented in a Confirmation of Action Letter issued by the Regional Office on April 11, 1983.

Contrary to the above, detailed records of beta radiation surveys performed April 23 and May 3, 1983 were not kept. These records were required to evaluate the beta radiation levels during the inspection and maintenance of Unit 1 snubbers.

RESPONSE:

(1) CORRECTIVE ACTIONS THAT HAVE BEEN OR WILL BE TAKEN:

Upon learning that the inspector considered the failure to document individual task related beta dose surveys a deviation from the Confirmation of Action Letter, a written memorandum was issued to Health Physics supervisory personnel to clarify this matter. Survey documentation is reviewed frequently to ensure compliance with records requirements. Furthermore, a verification check is performed to ensure survey records are complete prior to the issuance of each Radiation Work Permit (RWP).

Additionally, procedure modifications are being developed to formalize and further delineate the current requirements regarding beta surveys.

(2) CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS:

The corrective actions stated above are deemed adequate to prevent further deviations.

(3) THE DATE CORRECTIVE ACTIONS WERE OR WILL BE COMPLETED:

The written memorandum referred to above was issued on May 4, 1983. Procedure modifications will be completed by August 15, 1983.