

74

USNRC REGION II
ATLANTA, GEORGIA
VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

July
83 ~~83~~ 6 A8:45
June 28, 1983

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

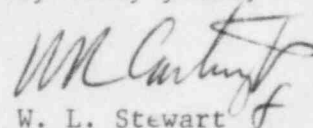
Serial No. 335
NO/JHL:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of May 23, 1983 in reference to the inspection conducted at North Anna Power Station between April 25, 1983 and April 29, 1983 and reported in IE Inspection Report Nos. 50-338/83-12 and 50-339/83-12. Our responses to the specific infractions are attached.

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

Attachment

cc: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing

Mr. M. B. Shymlock
NRC Resident Inspector
North Anna Power Station

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/83-12 AND 50-339/83-12

NRC COMMENT: (Item A)

Technical Specification 6.8.1.a requires that procedures shall be established, implemented and maintained for radiation protection. Section 2, "Control of Radioactive Material" of the station Health Physics Manual, part 2.2.2.2.A.2 states: "any item to be considered clean and/or unconditionally released from a Restricted Control Area must not exceed 0.1 mR/hr at one inch or 1000 dpm/100cm² (Beta-gamma) removable contamination".

Contrary to the above, on April 27, 1983, a mop head reading 10 mR/hr (Beta-gamma) was found outside the radiological (restricted) control area in a scrap scoop.

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

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The Notice of violation is correct as stated.

(2) REASONS FOR VIOLATION:

The violation resulted from personnel error. The radioactive material was either not monitored by Health Physics prior to being removed from the Restricted Control Area as required by the station Health Physics Manual, Section 1, or an inadequate survey was performed by Health Physics prior to its release.

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

Upon notification by the NRC Inspector, the mop head was immediately retrieved, surveyed, packaged and labeled as radioactive material and properly disposed of as radioactive waste. A follow-up survey of the plant Restricted Clean Area was performed. No radioactively contaminated items were found outside of the Restricted Control Area. On the following day, an inspector accompanied by a licensee representative conducted a radiation survey of the Louisa County Landfill where trash and scrap is transported by the station for burial. No radioactivity above natural background level was found. The finding of this single item outside the Restricted Controlled Area appears to be an isolated event and does not indicate a breakdown of the radioactive material control program at the station.

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

The Health Physics Technician Retraining and the General Employee Training/Retraining programs have been specifically upgraded to emphasize that all equipment, tools and material to be removed from the Restricted Control Area are to be properly monitored prior to release.

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/83-12 AND 50-339/83-12

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

Full compliance has been achieved.

NRC COMMENT: (Item B)

10 CFR 20.203(b) requires in part that each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "CAUTION RADIATION AREA".

Contrary to the above, on April 26, 1983, it was observed that two separate areas of the Auxiliary Building were not posted as a radiation area bearing the words: "CAUTION RADIATION AREA". These two areas were the "A" Boron Evaporator Reboiler Room and the Auxiliary Building Sump Area. Radiation levels in these areas ranged from 6 mr/hr to 15 mr/hr whole body exposure.

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

RESPONSE

Virginia Electric & Power Company denies this is a violation of NRC requirements and requests that this violation be withdrawn. A request for an interpretation of 10 CFR 20.203(b), with regard to this matter, will be submitted in accordance with 10 CFR 20.6.

DISCUSSION

The North Anna Auxiliary Building is maintained as a Restricted Control Area, access to which is limited to those plant personnel needing to gain entry for work, surveillance, inspections, etc. This access is normally controlled through a single entrance door adjacent to the Health Physics office in the Service Building. Self-reading dosimeters are required for entry and are issued in this area, and radiological status boards are maintained with current radiological survey information posted. Special case entry may be gained through large equipment loading doors and normally closed fire protection doors; however, this type access is administratively controlled by Health Physics and issuance of a Radiation Work Permit is required. The Auxiliary Building entrance is conspicuously posted with a sign bearing the radiation caution symbol and the words: "CAUTION RADIATION AREA" to inform plant personnel entering a radiation area as defined in 10 CFR 20.202(b)(2). Fire protection doors are conspicuously posted with a sign bearing the radiation caution symbol and the words: "CAUTION RADIATION AREA" and/or "CONTROLLED AREA AUTHORIZED ENTRY ONLY".

Areas within the Auxiliary Building are surveyed on a daily basis. Health Physics personnel are assigned to provide coverage of special maintenance work, in addition to ensuring that all areas are monitored and posted (e.g. "CAUTION: HIGH RADIATION AREA", "CONTAMINATED AREA", "AIRBORNE RADIOACTIVITY AREA", etc.) in accordance with 10 CFR 20 and consistent with the North Anna

Health Physics and ALARA programs. By virtue of this radiation area posting and administrative controls, all personnel are required to wear personnel monitoring devices, thus providing an additional means of radiation exposure control. The Virginia Electric & Power Company supports the concept of area posting as defined in Draft NUREG 0761, "Radiation Protection Plans for Nuclear Power Reactor Licensees", March 1981, Section 5, "Dose Control", item C.5, in all plant areas with the exception of the Reactor Containment, Auxiliary Building and Fuel Building. These buildings do not have easily defined areas which meet this criteria for radiation area posting, nor are radiation areas limited to single rooms at the present time. These plant areas have multiple radiation sources that vary in intensity according to the condition of the plant. The multiple radiation sources produce radiation fields varying in intensity according to reactor power levels and the operation of individual systems and components in a way that makes posting discrete areas within the buildings inappropriate. Furthermore, posting of every discrete radiation area within these buildings will degrade the overall posting effectiveness by desensitizing and confusing plant workers, thereby creating an additional, unnecessary radiological hazard.

In conclusion, Virginia Electric & Power Company contends that the posting of the North Anna Auxiliary Building as a single radiation area is consistent with the requirements of 10 CFR 20.203(b) and the guidance provided in NUREG 0761.