

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

January 20, 1984

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

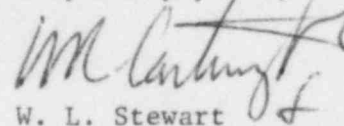
Serial No. 765
NO/WDC:jab
Docket Nos. 50-280
50-281
Licenses: DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of December 21, 1983, in reference to the inspection conducted at Surry Power Station between October 31 and November 4, 1983, and reported in IE Inspection Report Nos. 50-280/83-34 and 50-281/83-36. Our response to 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 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. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

8402280505 840221
PDR ADOCK 05000280
Q FDR

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/83-34 AND 50-281/83-36

As a result of the inspection conducted on October 31 - November 4, 1983 and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

A. NRC COMMENT:

10CFR20.201 requires that each licensee make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10CFR20.202 requires that each licensee supply appropriate personnel monitoring equipment to, and shall require the use of such equipment by each individual who enters a restricted area under such circumstances that he receives, or is likely to receive a dose in any calendar quarter in excess of 25% of the applicable value specified in paragraph (a) of 20.101.

Contrary to the above, the requirement to perform an evaluation to ensure compliance with applicable regulations was not met in that on November 3, 1983, a thermoluminescent dosimeter was not placed on a worker installing shoring in the shipping cask for a let down filter in a position such that it monitored the part of the whole body receiving the highest dose. In addition, the requirement to provide appropriate monitoring devices was not met in that the worker's extremities were not monitored.

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 violation resulted from personnel error and failure to follow procedures on the part of Health Physics supervision involved with the cask loading operation.

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

An evaluation of the dose received by the individual working with the shipping liner was performed and resulted in the assignment of an additional 171 mrem to the whole body (calculated dose to the head) and 268 mrem to the extremities (calculated dose to the right hand). This additional dose assignment did not result in accumulated doses in excess of the limits specified in 10CFR20.101. Radiation Work Permits utilized for the processing, movement and handling of high activity radioactive waste were revised to provide additional precautions and guidance on

proper evaluation of non-uniform radiation fields and use of appropriate personnel monitoring devices.

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

Additional training in the proper methods to evaluate non-uniform radiation fields and determinations to ensure appropriate placement of the personnel monitoring devices is planned. This training should increase awareness and improve the performance of Health Physics personnel in this area.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved with regard to corrective actions taken in response to the violation. The additional training discussed above will be completed by July 1, 1984.

NOTICE OF DEVIATION

B. NRC COMMENT:

Based on the results of the NRC inspection conducted on October 31 - November 4, 1983, certain of your activities appear to deviate from your commitments to the Commission as indicated below:

In a letter dated July 28, 1983, the licensee responded to a Notice of Violation reported in Region II Inspection Report Nos. 50-280/83-14 and 50-281/83-14. In that response the licensee stated that procedures governing the use of sealed sources would be revised to require more stringent control and documentation over the issuance and return of these materials and that the procedural modification would be completed by August 15, 1983.

Contrary to the above, the procedural modifications had not been completed as of November 3, 1983.

RESPONSE:

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

The failure to complete and implement the source control procedure modifications by the commitment date (August 15, 1983) resulted from an oversight on the part of Health Physics supervision. A draft revision to the procedure had been routed to appropriate review groups, however, the tracking of this review and the implementation due date failed to ensure completion. The revised procedure was approved and implemented on November 4, 1983. Additionally, the Station Commitment Tracking System and the internal tracing of commitments within the Health Physics

Department were reviewed to ensure no further NRC commitments had exceeded their due date.

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

Additional emphasis on, and review of Commitment Tracking Status Reports has been provided by Station management. Improved documentation of actions taken to fulfill commitments should provide assurance against further deviations.

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

The source control procedure modifications were completed on November 4, 1983. No further corrective actions are deemed necessary at this time.