

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

USNRC REGION II
ATLANTA, GEORGIA

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

August 1, 1983

United States Nuclear Regulatory Commission
Attn: Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
Washington, D. C. 20555

Serial No. 299B

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Docket Nos. 50-280

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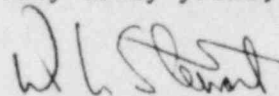
Gentlemen:

SUPPLEMENTAL RESPONSE TO IE INSPECTION REPORT NO. EA 83-36
SURRY POWER STATION

As requested in a telephone conversation on July 14, 1983 between Al Gibson (NRC-Region II) and W. L. Stewart (Vepco), attached is the supplemental response to IE Inspection Report No. EA 83-36. Attachment 1 summarizes Vepco Management's actions to address the programmatic aspects of Health Physics. Attachment 2 provides supplemental information, as requested, for specific examples cited in the Inspection Report EA 83-36.

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

Attachments

cc: Mr. James P. O'Reilly
Regional Administrator
Region II

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

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ATTACHMENT 1

Provided below is a summary of Vepco Managment actions to address programmatic aspects of Health Physics:

One consultant was hired immediately to make an assessment of Health Physics (HP) practices and procedures at Surry and several recommendations were made. A second consultant was retained to implement procedures. In order to assist them in writing procedures, this consultant did an overall assessment of Vepco's HP program (Surry, North Anna and Corporate). This consultant also provided us with an assessment report and a proposed action plan. We are evaluating their recommendations and developing an action plan for implementation of corrective actions. Also, North Anna HP has been evaluated as a followup effort by the first consultant.

Management remains fully committed to a HP program that protects radiation workers and complies with Technical Specifications and applicable Federal Regulations. The Station Manager has written memoranda to station supervision concerning a need for commitment to health physics practices. All radiation workers at Surry are being retrained and either the Station Manager or the Assistant Station Manager are participating in this effort. Both Quality Assurance and Corporate Health Physics increased their surveillance/audit activities related to HP immediately following the NRC Notice of Violation. Corporate HP has revised its procedures to include an escalation to management of concerns related to unresolved items.

Subsequent to NRC Notice of Violation, a major station cleanup and decontamination effort was implemented. This cleanup effort is considered long-term and continues. The size and number of contaminated areas in the Auxiliary Building have been greatly reduced. Large volumes of contaminated equipment and radioactive material stored onsite and that resulting from the cleanup effort have been collected, processed, and packaged and we are in the process of shipping the packages to disposal facilities. An upgrading of facilities is being studied to improve radiological controls and the flow of personnel into/away from the restricted areas of the plant.

Vepco's HP Program Review Committee is in the process of making recommendations to management to upgrade and standardize HP technician training and retraining at Surry and North Anna.

Our program of management involvement and QA/Corporate HP audit surveillance will, in conjunction with the above actions, improve the HP program at Surry. Also, long-term actions include the development of a Vepco Radiation Protection Plan using the guidance provided in Draft NUREG 0761, Radiation Protection Plans for Nuclear Power Reactor Licensees, and the standardization of station HP procedures and policy to the extent practicable in order to ensure a more effective HP program.

ATTACHMENT 2

Provided below are supplemental responses to specific examples in IE Inspection Report EA 83-36:

RESPONSE TO EXAMPLE 1:

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

Further evaluation of procedures related to assessment of airborne radioactivity has resulted in additional modifications to ensure more adequate surveillance in this area. These modifications correlate air sampling criteria to the assignment of respiratory protection equipment for specific work tasks. Field analysis methods are provided to aid technicians in timely determinations regarding the adequacy of respiratory protection provided to workers. Frequent reviews of air sampling results are being performed to ensure newly established criteria are followed.

RESPONSE TO EXAMPLE 2:

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

The reassessment of radiation dose received by a decontamination technician performing work on reactor coolant pump bolts resulted in the assignment of additional quarterly accumulated dose to the whole body and extremities. The additional whole body dose assigned totaled 188 mrem; which, when added to a quarterly accumulated dose of 1,529 mrem resulted in an adjusted total quarterly whole body dose of 1,717 mrem. Similarly, an additional 732 mrem was assigned to the extremities, resulting in an adjusted total quarterly extremity dose of 2,285 mrem.

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

The Review of the Radiation Work Permit (RWP) Program is continuing with the aid of a consultant experienced in this area. In the interim, Health Physics Supervisory personnel are required to review each RWP prior to issuance to ensure that all prescribed radiation protection requirements are appropriate, adequate and consistent with good Health Physics practice.

RESPONSE TO EXAMPLE 3:

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

Since submittal of the original response, additional training in radiological controls and procedures has been administered to nearly all radiation workers at the site (a small percentage of personnel remain to be trained in make-up sessions). This training, which reviews and emphasizes those areas where poor performance has been identified, is being conducted with the participation of the highest levels of station management to ensure an understanding of its objective. Health Physics personnel instruct the workers on proper radiation protection procedure and provide clarification when workers pose specific questions. The requirement for strict compliance with procedures and posted instructions is reinforced throughout the training sessions.

RESPONSE TO EXAMPLE 4:

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

A review of high radiation areas within Unit No. 2 containment was accomplished immediately after initial radiation surveys of the building were taken. Lockable enclosures were installed in two areas where radiation levels warranted this measure. Health Physics personnel control access to other areas where lockable barricades are not feasible or the scope of maintenance work require continuous surveillance.

RESPONSE TO EXAMPLE 5:

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

The special training sessions being conducted (as described above in the response to Example 3) encompass the problems observed by the inspector and those identified in Quality Assurance Audits subsequent to the inspection. This training will be completed by August 15, 1983. The policies set forth in this training have the full support of station and corporate management and will be the subject of continuing audits to ensure compliance is maintained.