

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

June 15, 1983

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

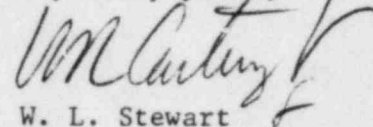
Serial No. 299A
NO/WDC:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

This letter corrects our response to IE Inspection Report No. EA 83-36, Vepco letter dated June 3, 1983 (Serial No. 299). On Page 3 in our Response to Example 1 under Section (2) a sentence was omitted. The following sentence has been added as the third sentence of the paragraph: "Whole body counts stemming from terminations of transient workers, and other outage related requirements had disclosed no incidents of internal contamination." Also in our Response to Example 1 under Section (3) in the first sentence of the second paragraph the word "contaminated" has been deleted and replaced by the word "exposed".

A corrected Page 3 is attached.

Very truly yours,



W. L. Stewart

Attachment

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

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

RESPONSE to Example 1:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated for Example 1.

(2) REASONS FOR VIOLATION:

The need to obtain adequate air samples in the breathing zone of the workers stated in the example was not recognized due to the lack of appropriate procedural guidance for air sampling criteria. Additionally, respiratory protection policies in effect at the station were deemed conservative for the situations encountered. Whole body counts stemming from terminations of transient workers, and other outage related requirements had disclosed no incident of internal contamination. Thus, health physics personnel failed to obtain more representative air samples to verify that protection factors afforded to the workers were adequate.

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

Health Physics Procedure HP-3.3.2, Health Physics Survey-Air Sampling, was revised and approved on April 7, 1983 to provide more detailed guidance for the evaluation of airborne radioactivity. Health Physics Technicians were provided specific training on the revised procedure and were tested to ensure adequate understanding. The revised procedure specifically directs technicians to assess airborne radioactivity at the workers breathing zone to ensure these measurements are suitable.

To confirm the adequacy of respiratory protection provided to workers during the Unit No. 1 outage, whole body counts were obtained of all potentially exposed personnel (770) and an evaluation was performed to determine if significant uptakes had occurred. This evaluation showed no evidence of such uptakes.

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

Further review and evaluation will be performed to improve the procedural guidance provided to technicians in the assessment of airborne radioactivity. Improvements will be investigated in the development of specific action points, quick assessment techniques and guidance on immediate follow-up actions.

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

Full compliance will be achieved by June 15, 1983.

Example 2. Notwithstanding 10 CFR 10.201(a) and (b), the requirements to conduct surveys to ensure compliance were not met in the following instances:

- a. Beta radiation surveys performed by the licensee failed to identify the presence of significant beta radiation levels in Unit 1 containment.
- b. The evaluation performed prior to decontamination of six reactor coolant pump bolts on March 24, 1983, did not result in the placement of the whole body TLD on the part of the whole body that would receive the highest dose and did not result in the use of extremity monitoring.