

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

84 MAR 2 AII : 40

March 28, 1984

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

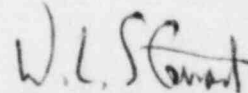
Serial No. 133  
NO/WDC:acm  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of February 28, 1984 in reference to the inspection conducted at Surry Power Station on January 23-25, 1984 and reported in IE Inspection Report Nos. 50-280/84-01 and 50-281/84-01. Our response 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. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

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

Mr. Richard C. Lewis, Director  
Division of Project and Resident Programs

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RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/84-01 AND 50-281/84-01

The following violations were identified during an inspection conducted on January 23-25, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

NRC COMMENT:

1. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(10) requires that the licensee's emergency plans include a range of protective actions, consistent with Federal guidance for the plume exposure pathway EPZ for emergency workers and the public.

The Federal guidance on protective actions to be recommended to offsite officials for general emergencies is addressed in Appendix 1 of NUREG-0654/FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Response Plans and Preparedness in Support of Nuclear Power Plants." This guidance is clarified by IE Information Notice No. 83-28: "Criteria for Protective Action Recommendations for General Emergencies."

Contrary to the above, in the case where prompt protective action recommendations are warranted by plant conditions and site boundary doses are not projected or occurring, the licensee's Emergency Plan and associated Implementing procedures do not require consideration of protective action recommendations consistent with Federal guidance.

This is a Severity Level IV Violation (Supplement I) and applicable to all units.

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation as stated is partially correct.

The Surry Emergency Plan, Section 4, Emergency Conditions and Implementing procedure EPIP-1.05, Response to General Emergency, require consideration of protective action recommendations. However, EPIP-2.01, Notification of State and Local Governments, if performed mechanically would not provide for communication of protective action recommendations for General Emergencies which do not involve release of radioactive material.

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/84-01 AND 50-281/84-01

(2) REASONS FOR VIOLATION:

This shortcoming in EPIP-2.01 occurred when the procedure was revised on August 25, 1983, to remove the protective action recommendations listed on the "Report of Emergency to State and Local Governments" form (Attachment 1 to EPIP-2.01). The protective action recommendations were added to the "Report of Radiological conditions to the State" form (Attachment 2 to EPIP-2.01), which is used exclusively by the Commonwealth of Virginia. This action was taken at the request of state officials to allow them the prerogative of final decision on protective action measures for local areas. In revising the procedure we neglected to provide procedurally for communication of protective action recommendations to state officials when release of radioactive material was not a concern.

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

EPIP-2.01 was revised and approved by the Station Nuclear Safety and Operating Committee on March 1, 1984. This revision provides for communicating protective action recommendations to state officials for all conditions of a General Emergency.

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

Future revisions to procedures will be evaluated with a greater awareness for the total effect of minor changes.

The Surry Emergency Plan will be amended to more clearly require consideration of protective action recommendations for General Emergencies not involving release of radioactive material.

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

Full compliance will be achieved by April 30, 1984.

RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-280/84-01 AND 50-281/84-01

NRC COMMENT:

2. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training.

Section 5.0 of the Surry Emergency Plan states, in part, that recommendations for protection actions will be made by the Station Emergency Manager. Section 5.0 also states, in part that after declaring an emergency, the Shift Supervisor becomes the Station Emergency Manager.

Contrary to the above, as evidenced by interviews with Shift Supervisors during the inspection, adequate training had not been provided Shift Supervisors for EPIP 1.05, relating to protective action recommendations.

This is a Severity Level IV Violation (Supplement I) and applicable to all units.

RESPONSE:

- (1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

The violation is correct as stated.

- (2) REASONS FOR VIOLATION:

An audit of training records during this inspection revealed that Emergency Preparedness Training had been conducted in accordance with Section 8 of the Surry Emergency Plan, however, insufficient emphasis was placed on training relative to protective action recommendations.

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

Special training sessions on protective action recommendations have been given. All personnel who could be designated Station Emergency manager received this training by March 16, 1984.

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

Specific training on protective action recommendations for Station Emergency Managers will be incorporated into the requalification program for senior licensed operators. All licensed senior operators, licensed staff and unlicensed staff who may be designated Station Emergency Manager will receive this training.

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

Full compliance will be achieved June 1, 1984.