

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 8, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Serial No. 91-154
NAPS/JHL
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

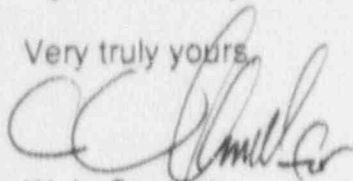
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
INSPECTION REPORT NOS. 50-338/91-05 AND 50-339/91-05
RESPONSE TO THE NOTICES OF VIOLATION

We have reviewed your letter of March 11, 1991 which referred to the inspection conducted at North Anna from February 4 - 8, 1991 and reported in Inspection Report Nos. 50-338/91-05 and 50-339/91-05. Our response to the Notices of Violation is attached.

If you have any further questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

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RESPONSE TO THE NOTICE OF VIOLATION
REPORTED DURING THE NRC INSPECTION CONDUCTED
BETWEEN FEBRUARY 4, 1991 AND FEBRUARY 8, 1991
INSPECTION REPORT NOS. 50-338/91-05 AND 50-339/91-05

NRC COMMENT

During an NRC inspection conducted on February 4-8, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990), the violations are listed below:

- A. 10 CFR 20.311 (b) requires each shipment of radioactive waste to a land disposal facility be accompanied by a shipment manifest that indicates as completely as practicable; a physical description of the waste; the volume; radionuclide identity and quantity; the total radioactivity; and the principle chemical form.

10 CFR 71.5 (a) requires each licensee who transports licensed material outside the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, to comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR 170 through 189.

49 CFR 172.2 requires a person, who offers hazardous material for transportation, to describe the hazardous material on shipping papers.

49 CFR 172.203 (d)(i) requires the description for a shipment of radioactive material to include the name of each radionuclide in the radioactive material and the activity contained in each package of the shipment in the terms of curies, millicuries, or microcuries.

Contrary to the above, on August 9, 1990, the licensee underestimated the correct radioactivity on the shipment manifest for radioactive waste shipment 90-11. The shipment manifest originally reported the total as 70.7 curies when the actual radioactivity was 232 curies.

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

- B. Technical Specification 3/4.7.11 requires that each sealed source in use containing radioactive material in excess of 100 microcuries of beta and/or gamma emitting material or five microcuries of alpha emitting material be tested for leakage and/or contamination at least once per six months. For stored sources not in use, the Technical Specification requires that each sealed source be tested prior to use.

Contrary to the above, the licensee failed to test for leakage a Victoreen High Range Field calibrator containing a 250 millicurie Cs-137 source during the period between June 11, 1987 and February 6, 1991, when the calibrator was used on at least seven occasions.

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

RESPONSE TO VIOLATION A

As stated in the Notice of Violation, no reply to Violation A is required. Corrective actions for Violation A have been completed and the actions were reviewed and documented in Inspection Report 91-05.

RESPONSE TO VIOLATION B

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated. However, clarification is required pertaining to the length of time the Cs-137 source was not leak tested. Documentation reviews indicate that the source was leak tested in July 1984 by the vendor and was not leak tested again until February 6, 1991.

2. REASON FOR THE VIOLATION

The violation was caused by inadequate procedures for performing prior to use leak testing of sources in storage. In addition, Radiation Protection personnel were not aware that a leak test was required prior to removing a source from storage.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The Cs-137 source was leak tested and removable contamination levels were verified to be less than Technical Specification limits.

Procedures were revised to ensure sources in storage in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material are properly leak tested.

A review was performed to verify that sealed radioactive sources in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material have been properly leak tested and are included in the semiannual leak test program.

Sources in storage that are in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material are labelled with information providing the operability and leak test requirements.

Radiation Protection personnel routinely involved in issuing sources have been counselled on the requirements for leak testing a source prior to it being issued from storage and a description of the event and corrective actions has been placed in the Radiation Protection Department required reading.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No further corrective actions are required.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.