

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 96-560
Docket No. 55-6236
License No. SOP-4301-4

Gentlemen:

SURRY POWER STATION UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/95-20 AND 50-281/95-20
OFFICE OF INVESTIGATIONS REPORT NO. 2-95-029

I have reviewed your letter dated October 18, 1996 and the enclosed Notice of Violation (NOV). As described in the attached reply to the NOV, I accept full responsibility for my error in judgment. Furthermore, I have taken corrective actions to ensure that I will not commit a similar mistake in the future.

I have no objection to this letter being made a part of the public record. Please contact me if you have any questions or require additional information.

Very truly yours,



Robert C. Allen

Attachment

9611220192 961122
PDR ADOCK 05000280
G PDR

IEU111

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

Verification of Accuracy

1. Memorandum from J. H. McCarthy to S. P. Sarver dated November 15, 1995
2. eMail from R. C. Allen to Operators, dated December 19, 1995, "Lessons Learned"
3. Shift Supervisor Qualification Summary for Bobby Allen - Nuclear Training dated March 1996; SSTP-PG-APP-D-ITP; SSTP-PG-APP-G/SSTP-1, SSTP-2, SSTP-3, SSTP-5, SSTP-6, and SSTP-7
4. Letter of Reprimand
5. R. C. Allen Speaking Points for October 2, 1996 Pre-Decisional Enforcement Conference
6. J. H. McCarthy Speaking Points for October 2, 1996 Pre-Decisional Enforcement Conference

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/96-09 AND 50-281/96-09
NRC OFFICE OF INVESTIGATIONS REPORT NO. 2-95-029

NRC COMMENT:

"During an NRC inspection conducted on September 14, 1995 through October 4, 1995, and an Office of Investigations investigation completed on June 28, 1996, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions,' NUREG-1600, the violation is listed below:

Senior Reactor Operator's License, SOP-4301-4, Docket No. 55-6236 (expired on December 28, 1995) required that you comply with all applicable rules, regulations, and orders of the Commission.

Surry Nuclear Power Station Technical Specification 6.4 required that detailed written procedures be provided for activities which would have an effect on nuclear safety and that those procedures be followed.

Procedure 1-OP-RC-011, Pressurizer Relief Tank Operations, Revision 1, Section 5.5, established the methods for venting the Pressurizer Relief Tank (PRT). Steps 5.5.5 and 5.5.6 required that a polyethylene hose be connected from Valve No. 1-RC-ICV-5025 to the nearest containment purge exhaust duct and Valve No. 1-RC-HCV-1549, PRT Vent, be closed, respectively.

Contrary to the above, on September 13, 1995, Mr. Robert C. Allen deliberately failed to comply with the provisions of his senior reactor operator license issued by the NRC. Specifically, Mr. Allen deliberately violated approved, detailed written procedures for the venting of the pressurizer relief tank in that:

1. A polyethylene hose was not connected from Valve No. 1-RC-ICV-5025 to the nearest containment purge exhaust duct: and
2. Valve No. 1-RC-HCV-1549, PRT Vent, was not closed.

This is a Severity Level III violation (Supplement VII)."

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-280/95-20 AND 50-281/95-20
NRC OFFICE OF INVESTIGATIONS REPORT NO. 2-95-029

1. Reason for the Violation, or, if Contested, the Basis for Disputing the Violation

The violation is correct as stated. I had reviewed the alternate vent path for the pressurizer relief tank (PRT) as well as the required actions to accomplish the venting and concluded that it could be done safely. However, at the time of the venting evolution, I was under considerable stress due to self-imposed outage schedule pressures and the extensive work load that I was handling. Rather than appropriately changing the procedure prior to venting the PRT with 1) valve 1-RC-HCV-1549 remaining open and 2) without connecting a polyethylene hose from 1-RC-ICV-5025 to the nearest containment purge duct, I continued venting the PRT contrary to the existing procedural requirements. My actions were not pre-meditated or malicious. They were not intended to avoid procedural compliance. My actions were the result of a mistake in judgment due in part to the heavy workload and being overstressed at the end of a particularly long and difficult work shift.

I would also like to take this opportunity to correct an error in the cover letter forwarding the NOV. In the second paragraph of the cover letter, it was stated that my actions "...resulted in simultaneous vent paths, one of which bypassed the process vent system causing an unmonitored, ground-level release." This statement is incorrect in that the second vent path for the PRT, i.e., through the instrument control valve 1-RC-ICV-5025, was to the containment atmosphere. The containment atmosphere vents through the ventilation vent system and was appropriately monitored. An unmonitored release did not occur as a result of this event.

2. Corrective Steps Which Have Been Taken and the Results Achieved

I have received a letter of reprimand from station management.

I have been reassigned from the position of Supervisor Shift Operations to the position of Operations Maintenance Advisor.

I have completed a formal, detailed, remediation action plan prepared by station management that included the following activities:

- Removal from licensed duties and expiration of my senior reactor operator license. (My license expired on December 28, 1995. Station

management has stated that they will not request that my license be reinstated in the future.)

- A structured interview and panel session with station management to discuss the event and my actions
- Interviews with all of the Nuclear executives to discuss the event and my actions
- Briefing Surry operators and supervision on this event and my personal lessons learned
- Enrollment in and completion of appropriate sections of the Shift Supervisors Training Program
- Personal review of recent station and industry events that were related to human performance
- Development of a schedule for periodic standards review meetings with the station management
- Development of a standard for the notification of the Operations Manager On Call (OMOC)

3. Corrective Steps Which Will be Taken to Avoid Further Violations

My personal commitment is to put this episode behind me as an isolated case of extremely poor judgment on my part. I intend to incorporate the lessons learned into my daily work habits and positively contribute to station performance in my new position. The lessons that I have learned from this experience, as well as the corrective and disciplinary actions noted in Item 2 above, will ensure that I will not commit a similar violation in the future.

4. The Date When Full Compliance Will be Achieved

Full compliance has been achieved.