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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

November 26, 1985

Dr. J. Nelson Grace
Regional Administrator
Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

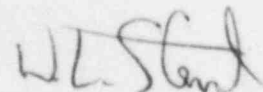
Serial No. 85-785
NO/HLM:dn
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

We have reviewed your letter of October 28, 1985 in reference to the inspection conducted at Surry Power Station on September 23-27, 1985 and reported in IE Inspection Report Nos. 50-280/85-29 and 50-281/85-29. Our response to the specific violation is attached.

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

Attachment

8512200193 851126
PDR ADOCK 05000280
Q PDR

IEC 1 1/1

cc: (w/attachment)

Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

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

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-280/85-29 and 50-281/85-29

VIOLATION

Technical Specification 6.4.A.4 requires detailed written procedures to be provided for various conditions including the release of radioactive effluents. 10 CFR 20.201(b) requires the licensee to perform such surveys as (1) are necessary to demonstrate compliance with 10 CFR 20.106 which limits the release of radioactivity to unrestricted areas and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, procedures and surveys to meet regulatory compliance for effluent measurement capability were not adequate in that neither procedure HP-3.3.9 "Health Physics Survey Minimum Detectable Activity (MDA) Determination" dated 11/17/80 nor the licensee's current methodology utilized the correct formula for the determination of the analytical effluent measurement Lower Limit of Detection (LLD) as defined in Technical Specification Tables 4.9-1, 4.9-2, and 4.9-5.

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

RESPONSE

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

The violation is correct as stated.

(2) REASONS FOR VIOLATION

The violation occurred due to an oversight on the part of station Health Physics personnel charged with conducting the radiological effluent and environmental monitoring programs. The methodology utilized for determination of analytical LLDs did not contain the required decay calculation due to a failure to recognize the existence of nuclides (e.g., Xe-135m and Xe-138) with half-lives short in relation to typical sampling and counting time periods. As noted in the inspection report, this deficiency had been recognized and corrective actions were in progress at the time of the inspection.

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

Procedure HP-3.3.9 has been deleted and replaced by individual revisions to counting equipment calibration procedures. These procedures now require proper analytical LLD determinations at the time of periodic system calibration. Acceptance criteria are included to ensure that compliance with Technical Specification requirements is verified.

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

No further actions are deemed necessary.

(5) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.