

October 16, 1981

Eldon J. Brunner, Chief
Projects Branch No. 1
Division of Resident and Project Inspection
United States Nuclear Regulatory
Commission - Region 1
631 Park Avenue
King of Prussia, PA 19406

RE: Docket No. 50-22
Inspection Report No. 50-220/81-07

Dear Mr. Brunner:

The above referenced inspection reported in Appendix A, Notice of Violation, that ". . . procedures being used by a contract laboratory for determining the concentration of tritium and strontium 89 and 90 in effluents were not reviewed and approved as required." In response to Appendix A, the following information is provided:

Following the inspection, we requested copies of the required procedures from the contractor. In response, draft procedures were supplied to NMPC, and we were placed on a controlled copy procedure list to ensure receipt of future revisions.

To date, the final contractor approved procedures have not been received, although it is our understanding that a whole series of "high level" procedures is under preparation in response to requests from several utilities for these specific procedures. It is our intention to review and approve the required procedures within 30 days of receipt.

Full compliance will be achieved when these actions have been completed, presently anticipated to be by December 31, 1981. You will be kept informed if we are unable to meet the schedule.

We regard the review of non-safety related procedures by SORC as being inappropriate. This viewpoint is supported by the Radiological Technical Specifications, Section 6.5.1, which describes the SORC function as follows:

"6.5.1.1 The Site Operations Review Committee shall function to advise the General Superintendent Nuclear Generation on all matters relating to nuclear safety."

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Regulatory Guide 1.33 references a class of safety related procedures in Appendix A, part 7, for "limiting materials released to environment and limiting personnel exposure." Clearly, environmental analyses and analyses which are performed on monthly effluent composite samples do not contribute to limiting releases to the environment, since they occur long after the release has taken place. Releases are limited on the basis of grab sample analyses for gamma emitters, or by effluent monitor readings at the time of the release.

Our submittal of January 18, 1977, of proposed "Appendix I", Environmental Technical Specifications, retains a requirement for written procedures but deletes review of these procedures from the responsibilities of SORC, as is appropriate for this class of procedures.

In the event that a particular contractor does not conduct operations in accordance with a written procedure, his services should not automatically be rejected. Other valid determinants of quality of analysis are equally, if not more valid in determining performance.

One of these, the analysis of split samples, has been performed as noted in the above referenced inspection report.

Clearly, it is not appropriate for each and every function performed by a licensee to be the subject of a written procedure reviewed by SORC. We welcome further discussion of this subject when the Technical Specifications submittal comes up for review.

Sincerely



Thomas E. Lempges
Vice President -
Nuclear Generation

EWL/JND/jm

