

Environmental Policy Institute
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202/544-8200

February 20, 1979

Hon. Joseph Hendrie, Chairman
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Commissioner Hendrie:

The Environmental Policy Institute requests that the Commission reconsider the issuance of Amendment Nos. 46 and 47 to Facility Operating License Nos. DPR-32 and DPR-37 issued to Virginia Electric and Power Company (VEPCO) for replacement of the steam generators at Surry Power Station Unit Nos. 1 and 2.

We request review of the procedures by which the amendments were granted and the convening of a public hearing on the amendments. Notice of the proposed issuance of the amendments (44 FR 4057, January 19, 1979) was published only one day prior to the actual issuance of the amendments which were effective immediately upon issuance. Notice of issuance, which took place on January 20, 1979, was not published until January 29, 1979 (44 FR 5735).

We request review of the negative declaration made in the Environmental Impact Appraisal issued January 20, 1979 concerning the steam generator replacement and request the completion of a full environmental impact statement. The Appraisal rejected analysis of the radiologic impact made by Battelle Northwest Laboratories published as NUREG/CR-0199 "Radiologic Assessment of Steam Generator Removal and Replacement." The Appraisal found that differences between VEPCO's analysis and NUREG/CR-0199 of man/rem occupational exposures could be easily reconciled. NUREG/CR-0199 clearly notes that it considered both the VEPCO and Florida Power and Light analyses of steam generator replacement and that the substantial differences remained in the analysis. The Commission accepted without qualification VEPCO's estimate of 2,070 man/rem per unit while NUREG/CR-0199 showed potential exposures to be between 3,380 man/rem and 5,840 man/rem per unit. Furthermore, the Commission compared the occupational exposure to exposures encountered with repair and maintenance of defective steam generators, rather than with normal maintenance exposures, to justify high exposures. Finally, the Commission in its negative declaration found that releases to the environment were expected to be less than those resulting from normal operation and therefore they were without significant impact. The Commission must analyze the environmental impact based upon actual release and pathway analysis and not by comparison to normal operation.

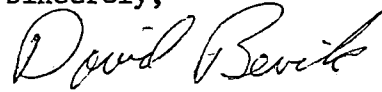
We request that no steam generator replacement activities be approved until the pending transient worker exposure regulations are promulgated (43 FR 4865, February 6, 1978, Proposed Rule). The 3,380 man/rem to 5,840 man/rem per unit occupational exposure estimates made in NUREG/CR-0199 represent extremely high exposure rates. These estimates, extended over the

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Surry units and Florida Power and Light's Turkey Point plant and Consumers Power's Palisades plant, which have applications pending for steam generator replacement, represent a very large number of transient worker exposures.

Finally, we request a complete review of the Commission's treatment of steam generator repair and replacement activities at pressurized water reactors. This review should be extended to include expected steam generator repair and replacement exposures over the lifetime of these units and design requirements to reduce steam generator maintenance exposures.

Sincerely,



David Berick



Bob Alvarez

DB:ejw

cc: Hon. Gary Hart
Hon. Morris K. Udall ✓