

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 13, 1979

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. A. Schwencer, Chief  
Operating Reactors Branch No. 1  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No.: 665  
PO/HSM:svm  
Docket Nos.: 50-280  
50-281  
License Nos.: DPR-32  
DPR-37

Dear Mr. Denton:

In our submittal to you concerning the steam generator replacement project, dated August 17, 1977, we committed to inspect and replace the HEPA filters on the engineered storage facility for the old steam generators on a monthly basis for the first year of steam generator storage. After the first year the data was to be reviewed, and based on that review a permanent surveillance program would be established.

It has already become apparent that monthly replacement is much too frequent as technicians inspecting the filters have reported them to be in an "almost new" condition. In addition samples of removed filters have been analyzed for radioactive particulates using a Geli detector. None of the samples analyzed have shown particulate accumulation in detectable amounts. This condition is to be expected however as the air flow through these filters is due only to the expansion and contraction of the air in the building due to temperature changes. Due to this lack of particulate accumulation it will be very difficult to meaningfully extrapolate the data into a permanent surveillance program for these filters.

For the reason stated above we would like to increase the present surveillance period from monthly to quarterly and then evaluate the results at the end of one year. Your concurrence in this matter is requested. If you require any further information we would be pleased to discuss this matter with your staff.

Very truly yours,

*C. M. Stallings*

C. M. Stallings  
Vice President - Power Supply  
And Production Operations

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cc: Mr. James P. O'Reilly, Director  
Office of Inspection and Reinforcement - Region II

*Adol  
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