

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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April 10, 1981

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 204
NO/RMT:ms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of March 17, 1981 in reference to the inspection conducted at Surry Power Station between February 3-6, 1981, and reported in IE Inspection Report Nos. 50-280/81-02 and 50-281/81-02. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports 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.

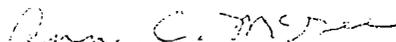
Very truly yours,



B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

City of Richmond
Commonwealth of Virginia
Acknowledged before me this 10th day of Apr, 1981


Notary Public

My Commission expires: 2-26, 1985

SEAL

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 3
Division of Licensing

8106090 259

RESPONSE TO NRC INSPECTION REPORT NOS.
50-280/81-02 AND 50-281/81-02

Notice of Violation:

Technical Specification 4.9.E - as defined in Table 4.9-1 (Environmental Monitoring Program), requires, in part, that the following program parameters shall be monitored and analyzed at the indicated frequencies, viz.: (1) milk (monthly); (2) oysters and clams (quarterly); (3) James River water (semi-annually); (4) and crabs (annually).

Contrary to the above, the following radiochemical analytical requirements were not implemented: (1) analysis of milk samples collected during the month of January, 1980; (2) analysis of oysters and clams collected during the second calendar quarter of 1980; (3) analysis of James River water samples collected during the first semiannual period of 1980; (4) analysis of annual crab samples collected during July, 1980.

This is a Severity Level V Violation (Supplement VII.E).

Response:

The alleged violations, as stated above, are denied in their entirety. Our reasons for denial are as follows:

- (1) Table 4.9-1 of the Technical Specifications states that milk samples shall be collected from a minimum of four (4) sampling points; on a quarterly frequency; and analysis shall include I-131, Cs-137, Sr-90 and Calcium. The Notice of Violation erroneously states that the required sampling frequency for milk is monthly. In reality, milk samples are collected on a monthly basis from a total of five (5) locations. Thus, the actual program exceeds the requirements of the Tech Specs. One of the five monthly milk samples collected during January of 1980 was lost in transit to the vendor and, thus, no analyses were received for that sample. However, samples from the months of February and March 1980 were analyzed for the location in question; therefore, the quarterly Tech Spec requirement was met, and in fact, exceeded for all five locations.
- (2) The Notice of Violation states that analytical requirements were not implemented for oysters and clams collected during the second calendar quarter of 1980. The Tech Specs require, in Table 4.1-9, that oysters and clams be collected from a minimum of three (3) sampling points; on a quarterly frequency; and that a gamma isotopic analysis be performed. The program conducted in 1980 again exceeds the requirements of the Tech Specs. Oysters and clams were collected on a bi-monthly frequency; and oysters were collected from three (3) locations while clams were collected from five (5) locations. For all oyster and clam locations, the required gamma isotopic analysis were performed in May of 1980 (second calendar quarter). In July, 1980 (third calendar quarter) oyster and clam samples were lost in transit to the vendor; however, all oyster and clam samples collected in September, 1980 were analyzed and, thus the quarterly analysis required by Tech Spec was met.

- (3) James River water samples are required, in Tech Specs, to be collected from a minimum of two (2) locations on a semi-annual frequency. The required analysis are gamma isotopic and tritium on the composite of by-monthly samples, upstream and downstream of the Station. Samples of James River water are collected on a bi-monthly frequency from five (5) locations. Gamma isotopic analysis were performed on each of the five samples collected during the months of January, March, May, September and November of 1980. The samples collected during July, 1980 were lost in transit to the vendor, however, aliquots of these samples were included in the semiannual composites on which tritium analyses were performed. The requirements of the Tech Spec for James River water samples were met. The Notice of Violation alleging that required analyses for James River water were not implemented during the first semiannual period of 1980 is in error.
- (4) Crab samples are required to be collected from a minimum of one (1) location on an annual frequency by the Tech Specs. A gamma isotopic analysis is to be performed on crab samples collected. The Notice of Violation alleges that failure to perform the required analysis on crab samples collected in July, 1980 constitutes a violation of the Technical Specifications. The samples collected during July were in fact lost in transit to the vendor, however, samples collected in September, 1980 were analyzed as required by Tech Specs. The annual crab sample requirement was thus met.

In conclusion, there appears to be some misunderstanding regarding the requirements of the Technical Specifications and the program established to implement those requirements. Technical Specification 4.9-E states, "the environmental program given in Table 4.9-1 shall be conducted." The minimum program requirements specified in Table 4.9-1 were met or exceeded during 1980. The actual program conducted by the Station is designed to provide sample collection frequencies and locations which exceed, in most cases, the Tech Spec requirements. Health Physics procedure HP-3.5.1, "Health Physics Environmental: Sample Collection and Analysis" provides the actual program parameters and guidelines for conducting the program. The program design recognizes the potential for loss or destruction of samples and, therefore, establishes the conservatism needed to ensure compliance with the Tech Specs. The allegations set forth in the Notice of Violation have erroneously assumed that, analyses not performed as a result of sample loss automatically constitute a violation of the Tech Specs, when in fact additional sample analyses exist to provide compliance with the program requirements.