



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

MAY 26 1988

Report Nos.: 50-280/88-13 and 50-281/88-13

Licensee: Virginia Electric and Power Company
 Richmond, VA 23261

Docket Nos.: 50-280 and 50-281

License Nos.: DPR-32 and DPR-37

Facility Name: Surry 1 and 2

Inspection Conducted: April 25-29, 1988

Inspectors:

P. G. Stoddart
 P. G. Stoddart

5/18/88
 Date Signed

P. G. Stoddart for
 H. Bermudez

5/18/88
 Date Signed

Approved by:

John B. Kahle
 J. Kahle, Section Chief
 Division of Radiation Safety and Safeguards

5/18/88
 Date Signed

SUMMARY

Scope: This routine, unannounced inspection was conducted in the areas of radiological environmental monitoring, liquid and gaseous effluent processing, liquid and gaseous effluent monitoring and confirmatory measurements.

Results: No violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *D. L. Benson, Station Manager
- *P. F. Blount, Assistant Health Physics Supervisor
- *B. A. Garber, Health Physics Supervisor
- *E. S. Grecheck, Plant Manager
- *G. D. Miller Licensing Coordinator
- *S. P. Sarver, Health Physics Superintendent

Other licensee employees contacted included engineers, technicians, and office personnel.

NRC Resident Inspector

- *W. E. Holland

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on April 29, 1988, with those persons indicated in Paragraph 1 above. The inspectors described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee.

Semi-annual effluent reports for January-June and July-December 1987 were reviewed and found to be adequate. Tests of the HEPA and charcoal ESF filter systems were reviewed and found to be adequate. The radiological environmental air sampling program was reviewed and found to be adequate. Radioactive effluent monitoring, sampling and analysis programs were reviewed. Containment particulate and iodine monitor channels were out-of-service for Unit 2 to a result of mechanical problems with the filter tape drive; resolution of the problem was being actively pursued by station personnel. A total of 14 outstanding items were closed.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Licensee Action on Previous Enforcement Matters

(Closed) 50-280,281/87-22-01 (SL-4) Inability to Perform Source Check On 1-RM-LA-108 Liquid Radwaste Monitor in Accordance with Table 4.1-1(A) of the Technical Specification. The inspectors observed a control room operator perform a source check on 1-RM-LA-108 liquid radwaste monitor. The meter needle was observed to move from a reading of approximately

500 cpm to a reading of approximately 3,000 cpm upon source actuation. There were two major factors which made the source check successful. The first was the system decontamination effort noted in the closure of IFI 50-280,281/87-02-02 (see Paragraph 11 of this inspection report). The second was installation of a 22 uCi Cs-137 source in place of the original 8 uCi Cs-137 source. The combined effects of lower background through decontamination and higher count rate through provision of a larger source produced a positive source check instead of the imperceptible movement of the meter needle observed in earlier source checks. This matter is considered closed.

(Closed) 50-280,281/87-22-02 (URI): Perform An Evaluation to Determine If Slightly Contaminated Sludge Was Shipped to the Surry County Landfill. The licensee performed the requested evaluation. The licensee was unable to identify any specific source for the low level sludge contamination referenced in Inspection Report 50-280, 281/87-22. In the evaluation the licensee conceded that it was possible that shipments to the Surry county landfill of sanitary sludge, at radioactivity levels undetectable by normal survey methods, but detectable by laboratory analysis, could have been made on an approximately twice-annual basis in volumes of 10 to 20 cubic feet of material for each shipment and at radioactivity concentrations of Cs-137 and Co-60 on the order of 2-3 pCi/gram. At the levels of activity seen in sludge samples to date, the licensee considered that it was possible that previous shipments to the Surry County landfill had contained radioactive materials at levels within an order of magnitude higher or lower than the levels reported in Inspection Report Nos. 50-280,281/87-22. It was also concluded that external radiation levels from packages of dried sludge, as shipped, were such as to be undetectable with portable survey instrumentation, and it was therefore highly unlikely that previous shipments could be located "in-situ" at the Surry County landfill. The inspectors' review concluded that the evaluation was adequate. The licensee had adopted procedure revisions to prevent future shipments of potentially radioactive materials to the Surry County landfill. The inspectors agreed with the licensee's position that attempts to locate and retrieve past shipments of dried sanitary waste treatment sludge would be unproductive. This matter is considered closed.

(Closed) 50-280,281/87-22-03 (SL-4): Failure to Conduct An Evaluation and To Determine The Concentrations of Radioactive Materials Contained in the Sanitary Sewage Sludge. The licensee conducted an evaluation which acknowledged the presence of radioactivity at low concentrations in dried sludge raked from the sand filter drying bed. Efforts to locate the source of the contamination were not successful. Licensee representatives stated that the source was considered likely to have been concentration within the sewage digester from low-level or undetectable levels of contamination as no apparent radioactive inputs could be identified. Procedure CAP-53.0 was issued March 11, 1988, and incorporated periodic sampling of dried sludge, and sampling, analysis and sign-off by the Supervisor of Health Physics Technical Services before future sludge quantities can be disposed of. The licensee's response to this matter was considered adequate and this matter is considered closed.

4. Semi-Annual Radioactive Effluent Release Reports (84723, 84724)

The inspectors reviewed the the licensee's Semi-Annual Radiological Effluent Release Reports for the first half of CY 1987 (January-June 1987) and for the second half of CY 1987 (July-December 1987). The reports appeared to be complete and to contain the information specified in Regulatory Guide 1.21. A summary of the releases for the year (1987) is shown below.

<u>Gases</u>	<u>Quantity (Curies)</u>
Fission and Activation Products	3.08 E+02
Iodine - 131	1.81 E-02
Particulates (>8 day Half-Life)	2.84 E-03
Tritium	3.04 E+01

Liquids

Fission and Activation Products	5.17 E+00
Tritium	8.15 E+02
Dissolved Gases	2.65 E+00
Alpha Emitters	3.91 E-05
Volume of Liquid Released (liters)	2.96 E+08 liters
Volume of Dilution Water (liters)	2.21 E+12 liters

Gaseous releases of fission and activation products were lower than the average annual releases of 22 operating PWRs in NRC RII (4,400 Ci/yr/unit in CY 1986). On the other hand, liquid releases of fission and activation products, per operating unit, were 225% of the average releases of 22 operating PWRs in RII for the CY 1986 (last year for which all data was available at the time of inspection). It should be noted, however, that the licensee's CY 1987 releases were lower than in previous years.

Fission And Activation Products In Plant Effluents
(Surry, Units 1 and 2, Combined Releases)

<u>Year</u>	<u>Liquids</u>	<u>Gases</u>
1987	5.1 Ci	308 Ci
1986	8.77 Ci	1,990 Ci
1985	8.50 Ci	2,070 Ci
1984	9.73 Ci	6,960 Ci
1983	14.5 Ci	5,490 Ci
1982	6.7 Ci	21,100 Ci
1981	6.11 Ci	14,100 Ci

No violations or deviations were identified.

5. Radioactive Effluent Monitoring, Sampling and Analysis (84723, 84724)

The inspectors, accompanied by a licensee representative, inspected the plant gaseous and liquid radioactive effluent monitors and samplers.

The liquid radwaste monitor, RM-108, appeared to be operating satisfactorily. The licensee had experienced a number of problems with this monitor, principally the result of buildup of contamination over extended periods of time, the resultant high background count rate, and a check source which was too small to provide a measurable increase in metered countrate when the check source was actuated. Remedial actions taken by the licensee to correct these conditions included the modification of piping to incorporate spool piece connections instead of an all-welded configuration to facilitate access to the monitor's internal chamber, providing a new electro-polished sample chamber for ease of decontamination, revision of procedures to provide for system flushing with uncontaminated water to minimize contamination plateout on sample chamber surfaces, and a larger check source to provide an increased countrate upon check source actuation. The inspectors observed that the system's normal background (at the time of this inspection) was about 500 cpm and that check source actuation resulted in a visible meter deflection to about 3,000 cpm.

Containment particulate and iodine monitoring channels RM-159, -160, -259, and -260 were inspected at the request of the senior resident inspector. In discussion with licensee representatives, the inspectors were informed that the two monitoring systems concerned (i.e., RM-159/160 and RM-259/260) were Victoreen noble gas, particulate aerosol, and iodine aerosol monitors of a new type installed April 1987. These monitors incorporated a new type of filter paper drive. The vendor apparently encountered a number of mechanical breakdowns of the tape drive mechanism in the production models of the new monitors. The breakdowns began on a generic basis shortly after the licensee received and installed the units (about April 1987). When the licensee encountered failure of the tape drives and ordered spare parts for repair purposes, the vendor notified the licensee that repair parts could not be provided because of a "design change hold." In early March 1988, vendor factory representatives came to the licensee's facility and installed new components in the licensee's monitors. Both monitors worked well until the night of April 23, 1988, when the filter tape drive mechanism on the Unit 2 monitor RM-259/260 jammed again and the iodine and particulate channels were declared inoperable. As of the end date of this inspection, licensee electronics maintenance personnel had been unable to resolve the jamming problem and the licensee was considering bringing in vendor personnel to correct the problem. With the Unit 2 monitor RM-259/260 inoperable, the licensee met Technical Specification requirements by sampling and analysis of the containment atmosphere. This matter was further discussed with the Senior Resident Inspector.

The inspectors noted that the Unit 1 component cooling water system (CCWS) monitors RM-105/106 were reading at levels of approximately $1 \text{ E}+05$ cpm at both the local and control room panel readouts. A licensee representative stated that these levels were the result of system contamination which occurred prior to 1983.

The process monitor (RM-107) for the component cooling service water system (CCSWS) was noted to have been out-of-service for over a year. A licensee representative stated that this monitor detector was located in a well inside a pipe of the CCSWS and had been contaminated sometime prior to 1983, under the same circumstances which contaminated the CCWS and resulted in high readings on RM-105/106. The high radiation background resulting from the contamination made the monitor incapable of performing its intended function of responding to small intersystem leaks from the CCWS into the CCSWS. For this reason, the monitor had been declared out-of-service and the sampling and analysis program required by the Technical Specifications had been implemented. The licensee has discussed proposing a Technical Specification change removing RM-107 from the Technical Specification and adding sampling and analysis of water from the CCWS to the routine sampling and analysis table of the Technical Specification. In the cases of all three monitors (RM-105/106/107), the detectors are located in wells which are not accessible for decontamination.

In discussions between the inspectors and licensee personnel, it was noted that the licensee did not do regular correlations between sample analyses of liquids and gases from tanks to be discharged and corresponding effluent monitor readings as the tank are discharged to the atmosphere. The inspectors noted that many licensees follow the correlation practice and consider it to be an important tool in verifying the validity of discharge permits, calculations of total releases and effluent monitor operability.

During the above discussion, it was also noted that the licensee did not calculate a new effluent monitor alarm setpoint for each release of liquids, preferring instead to base alarm levels on the offsite MPC for iodine-131, assuming minimum dilution. Such a value was lower than any that would be calculated on the basis of sample analysis results. Such alarm settings were conservative and placed more restrictive bounds on licensee operation than using setpoints established separately for each use and based on both 10 CFR Part 20, Appendix B, and 10 CFR Part 50, Appendix I, as implemented by the Offsite Dose Calculation Manual (ODCM).

No violations or deviations were identified.

6. Environmental Radiological Monitoring (8072)

The inspectors accompanied licensee representatives during regular collection of week-long air samples from the eight environmental monitoring air sampling stations established for the Surry site. The eight designated stations were: Surry Station; Hog Island; Bacon's Castle; Alliance; Colonial Parkway; Dow Chemical; Fort Eustis; and Newport News. The inspectors observed sample change methods and noted that good sampling handling practice was used. The licensee representatives knew the sample route and locations and performed their tasks in a competent and professional manner.

All sampling equipment was functioning properly and appeared to be well-maintained. Sample enclosures were clean and free of debris and extraneous material. Collected samples were clearly labelled as to sample location, sample on and off times, air flow rate, and sample volume. Samples were to be shipped to the vendor laboratory for analysis.

No violations or deviations were identified.

7. Radioactive Gaseous Effluent Treatment System (84724)

The inspectors reviewed the licensee's system maintenance, leak testing, and charcoal iodine retention for the safety-related HEPA - charcoal gaseous filtration and adsorption systems. Technical Specification 4.12 requires, in part, that safety-related filtration and adsorption systems undergo the following operational testing:

- ° Each redundant train to be operated monthly for a period of at least 15 minutes if it has not already been in operation during the month.
- ° Once per refueling cycle, the operability of the entire safety-related portion of the auxiliary ventilation system is to be demonstrated.
- ° The fan flow rate is to be determined once per refueling cycle (approximately 18 months) or after each partial or complete high efficiency particulate air (HEPA) filter or charcoal adsorber change.
- ° A visual inspection to be made prior to air flow distribution tests, HEPA filter leak tests, or adsorber freon (halogenated hydrocarbon) leak tests; in accordance with ANSI N510-1975.
- ° Cold dioctylphthalate (DOP) leak test to be made initially, once per refueling cycle (approximately 18 months), after partial or complete high efficiency particulate air (HEPA) filter or charcoal adsorber change.
- ° A visual inspection is to be made prior to air flow distribution tests, HEPA filter leak tests, or adsorber freon (halogenated hydrocarbon) leak tests, in accordance with ANSI N510-1975.
- ° Cold dioctylphthalate (DOP) leak test to be made initially, once per refueling cycle (approximately 18 months), after partial or complete replacement of HEPA filters or charcoal adsorbers, or after any structural maintenance, per ANSI N510-1975.
- ° Freon (halogenated hydrocarbon) leak test to be made initially, once per refueling cycle, after partial or complete replacement of HEPA filters or charcoal adsorbers, or after any structural maintenance, per ANSE N510-1975.

- ° Laboratory test for retention efficiency of charcoal for methyl iodide, initially, once per refueling cycle, and after 720 hours of operation, in accordance with ASTM D3803.

The inspectors toured the HEPA filter and charcoal adsorber installations and reviewed licensee documentation on selected tests performed to meet the TS requirements. Items reviewed included procedure PT-32.9, issued June 17, 1985, for details on HEPA filter and charcoal adsorber testing. Test records for 1987, and the first three months of 1988, were reviewed for the following installations:

1-VS-FL-3A and 3B
 1/2-VS-FL-8
 1/2-VS-FL-9

HEPA filter and charcoal adsorber testing was performed under contract by qualified personnel of the Charcoal Service Corporation, Bath, North Carolina, except that charcoal adsorber methyl iodide retention efficiency laboratory tests were subcontracted to Nuclear Containment Systems, Columbus, Ohio. The most recent series of tests was conducted in late March and early April 1988. The contractor's test data, test results, test instrument calibration documentation and quality assurance program appeared to be satisfactory; in one system tested, charcoal did not meet the required TS criteria and the charcoal was replaced with a new pre-tested module, with required leak testing and fan testing being repeated following adsorber module changeout, in accordance with TS requirements.

Operational records of filter and adsorber system operation to meet the TS requirement for at least 15 minute of operation monthly were reviewed for the period of March 1, 1987 through March 31, 1988. The required operations appeared to have been done in conformance with the specification.

No violations or deviations were identified.

8. Audits (84723, 84724, 84725)

The inspectors reviewed licensee audit files for audits concerning matters within the scope of this inspection and performed or issued since the previous inspection (50-280,281/87-22, August 3-7, 1987).

Audit 587.17, dated July 29, 1987, but issued subsequent to the inspection of August 3-7, 1987, was concerned with the Process Control Program (PCP) and with the Offsite Dose Calculation Manual (ODCM). The audit documented two concerns of administrative nature: (1) Two procedures OP.22.1, "High Level Waste Drain System," (January 1979) and OP.22.2, "Low Level Drain System" (July 1982) were noted to be obsolete; and (2) Section 12.1 of the ODCM referenced an incorrect section of the Technical Specification in reference to the Semi-Annual Effluent Release Report. The later concern was a repeat finding, previously noted in a 1984 audit 584-32.

The licensee's responses to the audit concerns appeared to be timely and were considered to be adequate to meet the specified concerns. The audit appeared to have been performed in satisfactory depth.

No violations or deviations were identified.

9. Licensee Quality Assurance for Confirmatory Measurements (84725)

The inspectors requested and were supplied information concerning licensee internal quality assurance activities, including analyses of cross-check samples prepared by Virginia Power Company Corporate Health Physics for analysis in the Surry Count Room. In a memorandum dated September 30, 1987, the corporate Health Physics group reported that Surry analyses of three mixed gamma emitter liquid samples and one tritium liquid sample were all in agreement. All three liquid samples were analyzed on all three Surry intrinsic germanium detectors; the one tritium sample was analyzed on the one Surry Tritium analyzer.

In a memorandum dated June 15, 1987, from Corporate Health Physics to the Surry Plant, documenting an earlier cross-check, the memo noted disagreement on the Ce-144 result for detector No. 1 and agreement for Cs-134, Cs-137, Mn-54 and Co-60 for detector No. 1. For detectors No. 3 and No. 4, agreement was noted on all nuclides (Ce-144, Cs-134, Cs-137, Mn-54, and Co-60). In a Ce-144 re-check on detector No. 1, the re-check was in agreement.

The inspectors reviewed Corporate HP procedure CHP-9, "Confirmatory Measurements Using Spiked Samples." The criteria for agreement or disagreement appeared to be the same as that set forth in NRC Inspection Module 84725.

The inspectors reviewed data provided by the licensee's contract laboratory concerning the laboratory's participation in the EPA crosscheck program for the period between January 1, 1987 and December 11, 1987. The data consisted of statements of agreement or disagreement of the contractor laboratory analysis with EPA results on identical samples. The contractor laboratory's performance in analyses of some 35 separate samples appeared to be adequate.

The licensee's quality assurance programs, including those of the contractor laboratory appeared to be comprehensive and responsive to needs and were considered to be adequate.

No violations or deviations were identified.

10. Licensee Event Reports (92700)

(Closed) LER 50-280,281/87-040 (January 29, 1988)

On December 31, 1987, the licensee discovered that two week-long particulate filters from the effluent sampler servicing the containment

vacuum system gaseous discharge had been unintentionally discarded. Technical Specification 4.9, table 4.9-2 required that all weekly particulate samples taken during a calendar quarter be composited quarterly for analysis of Sr-89 and Sr-90 at an LLD of IE-11 uCi/ml. The specification was implemented by Health Physics Procedure HP.3.2.1. The analysis of the missing filters for principal gamma emitters had been accomplished prior to the discarding of the filters; results were typical of previous analyses for principal gamma emitters. The releases due to discharges from the vacuum system for the October-December 1987 calendar year quarter were estimated by Health Physics personnel from previous data; based on these estimates, the licensee calculated that releases for the quarter were within established limits for Sr-89 and Sr-90.

Health Physics supervision and management were notified of the missed analyses and reviewed the requirements of HP Procedure 3.2.1 and the Technical Specification with concerned HP personnel. HP Procedure 3.2.1 was revised March 31, 1988 to provide better control over retention of samples where required for compositing for weekly, monthly, and quarterly periods. Counting room personnel were counseled on the importance of maintaining strict control and accountability over samples to be analyzed in accordance with Technical Specification requirements and received training on the revision to HP Procedure 3.2.1.

Licensee initiatives in resolving the root cause of this event were considered appropriate and adequate to prevent a recurrence. This matter is considered closed.

(Closed) LER 88-004, Issued March 4, 1988, "Iodine Spike Due to Defective Fuel Element."

On February 16, 1988, at 1430 hours, the Unit 1 reactor coolant spiked at 1.17 uCi/ml of dose equivalent iodine-131, which exceeded Technical Specification (TS) 3.1.2.d (Limit 1.0 uCi/ml). This followed a reactor trip. Corrective action was to implement actions of T.S. Table 4.1.2.B, calling for four-hour interval sampling until dose equivalent iodine-131 (DEI) level dropped below 1 uCi/ml. The next sample, taken at 1725 hours on February 16, 1988, was 0.75 uCi/ml DEI, which was below 1 uCi/ml. The event duration was considered to be three hours, the approximate time interval between the two samples.

At the time of this inspection, Unit 1 was shutdown for scheduled refueling. Prior to defueling, the licensee planned to conduct ultrasonic testing of each fuel assembly in an effort to locate the defective fuel, which was believed to be limited to one fuel pin. If the assembly containing the defective pin could be identified, it was to be removed from the core. If not, the scheduled refueling operation would proceed. The licensee considered that it was probable that the fuel assembly with the defective pin would be among those scheduled for removal and replacement with new fuel during the outage.

The event was an iodine spike which exceeded the TS limit of 1 uCi/ml of dose-equivalent I-131 by a small margin in the period immediately following a reactor shutdown. The followup sample, taken three hours later, was analyzed at 0.75 uCi/ml. Such transient conditions are characteristic of power changes in nuclear power plants and are known to occur both on startup and shutdown, particularly in plants with known defective fuel; however, such spikes do not always occur where defective fuel is known to exist. The NRC does not consider iodine spiking of the order of magnitude seen in this event to be a significant safety problem.

The licensee's proposed actions to locate the defective fuel and the actions taken upon detection of the iodine spike were considered adequate and this matter is considered closed.

11. Inspector Followup Items

(Closed) 50-280/84-02-06, (IFI): Vendor Calibration of High Range Noble Gas Monitor (TMI-0737, II.F.1, Attachment 1). The inspector reviewed the vendor's Report of Calibration, Model KMG-HRH, High Range Channel," which described calibration of the high range detector channel at gamma energies provided by Xe-133 gas and solutions of Ba-133, Cs-137, and Co-60. Associated gamma energies were 81, 345, 662, and 1,250 KeV. Reference point sources of Cs-137, with NBS traceable calibration, were also used.

The principal NRC guidance in the calibration of the high range monitors responsive to the criteria of NUREG-0737, Item II.F.1, appears in a memorandum dated August 16, 1982, from D. G. Eisenhut, NRR, to Regional Administrators, Subject: "Proposed Guidance for Calibration and Surveillance Requirements for Equipment Provided to Meet Item II.F.1, Attachment 1, 2 and 3, NUREG-0737." The inspectors' review of the vendor calibration report concluded that the data provided in the report appeared to meet the guidance contained in the NRR memorandum of August 6, 1982, for type calibration and, therefore, were considered adequate. This matter is considered closed.

(Closed) 50-280, 281/86-IN-76 (Information Notice): Control Room Emergency Ventilation Problems. The inspectors and a licensee representative discussed actions taken by the licensee with respect to the concerns of Information Notice IN-86-76. The licensee had received the IN and had initiated several actions responsive to the IN. At the time of this inspection, two ventilation engineers were assigned full-time to work on the plant control room envelope, with assistance also provided from the Richmond, Virginia, corporate engineering staff. The North Anna control room habitability report was being used as a reference for possible related problems. This matter is considered closed.

(Closed) 50-280/86-06-XX (IFI): Review Licensee Action On Submitting Environmental Technical Specification Changes to Tables 4.9-5 and 4.9-4. The licensee submitted a proposed Technical Specification revision to the subject tables on May 14, 1987. As of the date of this inspection, the Office of Nuclear Reactor Regulation (NRR) had apparently not taken action

on this matter. For tracking purposes, the inspectors concluded that the licensee had taken appropriate action and this matter is considered closed.

(Closed) 50-280, 281/87-02-01 (IFI) Define Zero In Semi-Annual Effect Release Reports and Provide LLDs. The licensee's Semi-Annual Radiological Effluent Release Report for the period July-December 1987 provided the requested information. In discussions with licensee representatives, the inspectors were assured that future reports would be issued in the correct format. This matter is considered closed.

(Closed) 50-280, 281/87-02-02 (IFI): Improve Maintenance Program for RM-108 Liquid Radwaste monitor background. The licensee had modified monitor RM-108 by providing an electropolished sample chamber with access by removable spool pieces to facilitate decontamination. Additionally, operating procedures were revised to provide adequate flushing of lines with uncontaminated water after each potentially radioactive discharge. The inspectors observed that the instrument background level was approximately a factor of ten lower than had been observed in a previous inspection. This matter is considered closed.

(Open) 50-280, 281/87-02-03 (IFI) Resolve the Inoperability Problem of Component Cooling Service Water Monitor RM.SW-107. The line which RM.SW-107 monitors was contaminated several years ago. Residual contamination was such as to produce high background count rates which kept the monitor continually in alarm status, although a valid alarm condition did not exist. The licensee had been performing periodic sampling and analysis as required by technical specifications. At the time of the inspection, the licensee was developing a Technical Specification change request to delete the monitor from the Technical Specifications in favor of periodic sampling and analysis. Since the licensee had not submitted the requested change, NRR had taken no action. This item remained open pending licensee and NRR actions.