



**VIRGINIA POWER**

January 8, 1999

Mr. John Daley (3WC32)  
U. S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

Dear Mr. Daley:

This letter is being submitted pursuant to 40 CFR 61.150 (d)(4) and in accordance with your letter dated July 1, 1994 confirming that Virginia Power's procedure for tracking low-level radiologically contaminated asbestos waste (RCAW) is acceptable for maintaining compliance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations. This is official notification that Surry Power Station (1) has not received a copy of a waste shipment record (WSR), signed by the owner or operator of the designated waste disposal site within 35 days since the waste was shipped off-site (inquiry requirement time period) and (2) will not receive the WSR within 45 days (notification requirement time period).

On December 1, 1998, RCAW (Shipment S-98-3) was shipped from Surry Power Station to GTS Duratek and was received by GTS Duratek on December 2, 1998 (a copy of the asbestos WSR and GTS Duratek's receipt notification are attached for your review). Once the interim process is complete, the waste will be shipped to either Barnwell Waste Management Facility in Barnwell, South Carolina for final burial (see Line 3) or shipped to another licensed facility for burial. The interim process is taking longer than expected and the signed WSR was not returned to Surry Power Station within 35 days. Therefore, a search was initiated to determine the status of the waste shipment.

On January 5, 1999, the 35<sup>th</sup> day, Surry Power Station inquired to GTS Duratek about shipment S-98-3 and was informed by GTS Duratek in a telephone conversation that the waste shipment will be processed after the 35<sup>th</sup> day and will not be buried until after January 15, 1999, the required 45<sup>th</sup> reporting date. The waste shipment is still located at GTS Duratek. A copy of a written notification dated January 5, 1999, from GTS Duratek to Surry Power Station was forwarded to Virginia Power's Environmental Policy and Compliance (EP&C) Department and is attached for your review.

Once Surry Power Station receives the waste shipment records, the EP&C Department will be notified and then will notify the EPA that the outstanding WSR has been received and closed.

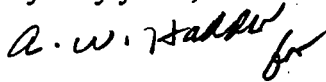
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Mr. John Daley  
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If you have any questions or concerns, please do not hesitate to contact me at (804) 273-3467 or Russ Wood at (804) 273-3015.

Very truly yours,



Pamela F. Faggert  
Manager  
Environmental Policy & Compliance

**Attachments**

cc: U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Surry Power Station  
Units 1 and 2  
Docket Nos. 50-280 and 50-281  
License Nos. DPR-32 and DPR-37

bc: Mr. E. S. Grecheck - SPS  
Mr. R. L. Blount - SPS  
Mr. J. H. McCarthy - IN-2SE  
Mr. W. A. Thornton - SPS  
Mr. M. R. Olin - SPS  
Mr. J. A. Keithley - SPS  
Ms. S. Corbin - SPS  
Mr. B. L. Stanley - SPS  
Mr. M. A. Holland - SPS  
Mr. R. S. Wood - IN-1SE *RSW 1-7-99*

CONCURRENCE:

Mr. R. H. Blount	<u>T.B. SOWERS 1/8/99 PER MAH PHONE CALL - RSW</u>
Mr. J. H. McCarthy	<u>WCS for JHM</u>
Mr. D. A. Sommers	<u>NOA 1/7/99</u>
Mr. M. A. Holland	<u>MAH 1/7/99 - PER MAH PHONE CALL - RSW</u>

### Verification of Accuracy

1. Regulatory requirement set forth in 40 CFR Part 61. (National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart M-National Emission Standard for Asbestos.
2. On June 14, 1994, Mr. A. W. Hadder issued a letter to Mr. John Daley, NESHAP Asbestos Coordinator for the EPA confirming the agreement to accept Virginia Power's procedure for tracking low-level radiologically contaminated asbestos waste (RCAW).
3. On July 1, 1994, Mr. John Daley, NESHAP Asbestos Coordinator for the EPA issued a letter to Mr. A. W. Hadder formally agreeing to Virginia Power's procedure for tracking low-level radiologically contaminated asbestos waste (RCAW).
4. On December 2, 1998, GTS Duratek issued a letter to the Surry Power Station with an acknowledgement of receipt of shipment S-98-3.
5. On January 5, 1999, GTS Duratek responded to Surry Power Station's inquiry of the status of the intermediate processing and the expected burial of shipment S-98-3.

### Commitments/Action Plan

1. EP&C must notify EPA, with a copy to the NRC, that the outstanding waste shipment record (WSR) has been received by the station.

### Changes to the UFSAR or QA Topical Report

None



Wednesday, December 2, 1998

Jim Keithley  
Virginia Power, Surry  
5570 Hog Island Road  
Surry, VA 23883

Dear Mr. Keithley:

In compliance with the requirements of 10 CFR 20, Appendix G, Section III, C.1, the attached signed shipping manifest copies are your notice of receipt and acceptance of the radioactive waste materials specified on the manifests.

Manifest Number

241-S98-3

Date Received

12/02/1998

This is acknowledgement of receipt only. Any manifest discrepancies found during manifest review, unloading or processing will be listed on page 2 of this letter.

Thank you for your business.

Sincerely

for  
T. Fred Schulz  
Supervisor  
Shipping and Receiving

cc: Manifest File  
Shipping and Receiving file- ...

None.

Manifest Discrepancies

DURATEK

ASBESTOS WASTE SHIPMENT RECORD

GENERATOR		
1. Work site name and mailing address Surry Power Station, 5570 Hog Island Rd. Surry, Virginia 23883	Owner's name Virginia Power Owner's telephone number (757)365-2010	Shipment Number S98-3
2. Operator's name and address Insulation Specialties, Inc. P.O. Box 127 501 Westover Ave, Hopewell, VA 23860		Operator's telephone number (804) 458-1555
3. Waste Disposal Site (WDS) name, mailing address, and physical site location Barnwell Waste Management Facility P. O. Box 726, Barnwell, South Carolina 29812		WDS telephone number (803) 259-1781
4. Name, and address of responsible agency Department of Labor and Industry, 13 South Thirteenth Street, Richmond, Virginia 23219		
5. Description of materials Radioactive material, LSA, n.o.s., 7, UN2912  Friable Pipe Covering	6. Containers no. and type (1) B-25 Box  Containing "BA" (bags)	7. Total quantity m <sup>3</sup> (yd <sup>3</sup> ) 2.55 m <sup>3</sup>
8. Special handling instructions and additional information For Shipment to intermediate processor: GTS Duratek 1560 Bear Creek Rd. Oak Ridge, TN 37831-2530 Telephone: (423) 481-0222		
9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name, are classified, packed, marked, labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.		
Printed or typed name and title Claude Lawrence / General Foreman	Signature <i>Claude T. Lawrence</i>	Month Day Year 12/3/98
TRANSPORTER		
10. Transporter 1 (acknowledgment of receipt of materials)		
Printed or typed name and title Tillman Grubbs DRIVER	Signature <i>Tillman Grubbs</i>	Month Day Year 12 1 98
Address 1560 BEAR CREEK RD. OAK RIDGE, TN 37831-2530		Telephone number 1-800-448-8624
11. Transporter 2 (acknowledgment of receipt of materials)		
Printed or typed name and title	Signature	Month Day Year
Address		Telephone number
DISPOSAL SITE		
12. Discrepancy indication space		
13. Waste disposal site owner or operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.		
Printed or typed name and title	Signature	Month Day Year



**DUPATEK**

**BEAR CREEK OPERATIONS**

1560 Bear Creek Road  
P.O. Box 2530  
Oak Ridge, TN 37831-2530

January 5, 1999

Mr Jim Keithly  
Virginia Power Company  
Surry Power Station  
P O Box 315  
Surry, VA 23883

Dear Mr. Keithly:

Per your request, this correspondence will serve as written documentation regarding the status of asbestos shipped to our Oak Ridge, TN facility on December 2, 1998. Manifest No. 241-S98-3. Because our processing schedule is determined at least 30 days in advance due to block scheduling, and since we compact asbestos on campaigns, your asbestos will not be buried within the requested 45 days of our receipt, or January 16, 1999.

Please give me a call at (423) 220-1613 if you require any additional information.

Sincerely,

Laura D. Williams  
Account Executive

cc: Susie Corbin, Dennis Hennen