

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



**VIRGINIA POWER**

February 17, 1995

Gerard Seeley, Jr., Director  
Piedmont Regional Office  
Department of Environmental Quality  
P. O. Box 6030  
Glen Allen, VA 23058

RE: SURRY POWER STATION - VPDES PERMIT NO. VA0004090  
TOTAL SUSPENDED SOLIDS EXCURSIONS, DECEMBER 1994

Dear Mr. Seeley:

We have received the Notice of Violation in reference to the December 1994 excursion of Total Suspended Solids limitations of the VPDES permit for Surry Power Station. The NOV was delivered to the station by an inspector from your staff on February 7, 1995. We were surprised and somewhat dismayed to receive an NOV regarding this particular event.

The subject discharge was stopped as soon as it was recognized that there may be a high solids content. Prior to confirmation by analysis, the event was promptly reported. Mr. Daniel James, Water Quality Department, discussed the situation with Ms. Camille Cook by telephone on December 27, 1994. The event was also addressed by my follow up letter dated January 3, 1995. The solids involved did not consist of any process waste discharge but were fine corrosion product solids, primarily magnetite and iron oxide, dislodged from the steam generator blowdown system during maintenance operations. The relative magnitude of this discharge is relevant in that the flow via Outfall 181 of less than 200 gpm enters the station's cooling water flow which is one million gpm inside the station at the water boxes. The resulting instantaneous dilution would provide an undetectable increase in concentration of solids over the ambient river water solids well before the cooling water reaches the discharge canal.

To provide further perspective in this issue, the flushing of municipal water distribution lines makes for a convenient comparison. Water systems are frequently flushed of corrosion particles, sediment, etc., with direct discharge to surface waters of much greater quantities than the subject discharge at Surry. As far as we are aware, this practice is deemed so insignificant that it is not considered a violation and does not even require a permit.

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The steam generator system from which the subject discharge originated is filled with very high purity water. Therefore, it is likely that this discharge contained fewer pollutants than do the municipal water systems that are freely flushed. The 257.7 mg/l TSS consisted of magnetite and iron oxide. Data on the other contents, from the station's in-line chemistry analyzer instruments that were monitoring the system at the time of the discharge, are:

pH	8.81 su
conductivity	1.81
sodium	2.5 ppb
chloride	<1.0 ppb
fluoride	1.3 ppb
sulfate	17.1 ppb
silicate	182.0 ppb

It would be appreciated if you would review this event with more consideration of the facts in the case to determine if issuance of the NOV is warranted. We request that, based upon the actual facts of this event, the NOV be rescinded.

Meanwhile, should you desire additional information or have any questions about this matter, please contact me at (804)273-2990 or Daniel James at (804)273-2996.

Sincerely,



B. M. Marshall, P.E. *for*  
Manager  
Water Quality

cc:

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U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., NW  
Suite 2900  
Atlanta, GA 30323  
Re: Surry Units 1 & 2  
Docket Nos. 50-280/50-281  
License Nos. DPR-32/DPR-37

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555  
Re: Surry Units 1 & 2  
Docket Nos. 50-280/50-281  
License Nos. DPR-32/DPR-37

Mr. M. W. Branch  
NRC Senior Resident Inspector  
Surry Power Station