

December 18, 1991

Mr. R. R. Jenkins Virginia Water Control Board Tidewater Regional Office 287 Pembroke Office Park Suite 310, Pembroke II Virginia Beach, VA 23462

RE: SURRY POWER STATION - VPDES PERMIT VA0004090, UNREPORTED PARAMETERS

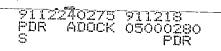
Dear Mr. Jenkins:

This is to confirm the December 2, 1991, telephone notification made to you by Mr. Daniel James of Virginia Power. On November 26, 1991, discharges were made from outfall 141, the 1A Waste Neutralization Sump, and from outfall 171, the 2B Waste Neutralization Sump, without full discharge monitoring being performed. Specifically, these discharges were not sampled for total suspended solids or oil and grease.

The discharges from both outfalls were made at 1014 p.m. on November 26. The volume discharged from outfall 141 was 20,346 gallons at a pH of 7.9, while the volume discharged from outfall 171 was 23,968 gallons at a pH of 7.6.

As you know, the VPDES permit for Surry Power Station was reissued in September 1991, with the first effective reporting period during the month of October. Outfalls 141 and 171 were newly included in that revised permit, and no discharges to the cooling water discharge canal were made via these outfalls during October. Although changes related to the reissued permit had been identified and discussed internally, formal procedural changes had not been implemented at the time of the discharge. Therefore, while the system contents were monitored for volume, and had the pH adjusted as a standard process, samples for additional analyses were not obtained, due to an oversight, rather than through any intentional failure to sample.

As corrective action, a Standing Order has been issued to Operations personnel, requiring notification to the Chemistry Department prior to discharge to the cooling water canal, so that the necessary samples will be obtained. In addition, applicable formal station procedures are being revised to include appropriate steps to ensure proper sample collection related to discharges newly included in the permit.



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Discharges had been made from these systems during the preceding permit period (1985-1991), during which time durations of the discharges were reported as required with the monthly Discharge Monitoring Reports to the VWCB. During this period, and during the period following the November 26, 1991, discharges, no adverse environmental impact was observed. The combined discharge of 44,314 gallons over a period of approximately an hour and 20 minutes was a relatively minor volume compared to the once-through cooling water flow of approximately 67 million gallons during this period, which provided dilution and buffering. same time Nonetheless, it is Virginia Power's intent and goal to fully comply with the letter and spirit of our VPDES permit, and to minimize Therefore, we will implement the impacts to the environment. corrective actions described above, with the full support of station management. We regret that such an incident has occurred.

Should you desire any additional information regarding this matter, please do not hesitate to contact Mr. Daniel James of my staff at (804) 273-2996.

Sincerely,

B. M. Marshall, P.E.

Manager

Water Quality

cc: Regional Administrator
USNRC, Docket No. 50-280/281
101 Marietta Street, N.W.
Suite 2900
Atlanta, GA 30323

Director, Office of Nuclear Reactor Regulation

USNRC - Resident Inspector Surry