

USNRC REGION II  
VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

August 25, 1980 28 P 1:33

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
Attn: Mr. J. Philip Stohr, Chief  
Fuel Facility and Materials  
Safety Branch  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

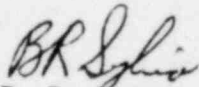
Serial No. 585A  
NO/RMT:ms  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Mr. O'Reilly:

In reference to your letters of August 12, 1980 and June 24, 1980, and our letter dated July 18, 1980, Serial Number 585, regarding an apparent item of non-compliance reported in IE Report Numbers 50-338/80-25 and 50-339/80-26, we are forwarding the attached supplemental response.

Although previous corrective action was taken, we still recommend that the infraction be deleted or changed to an open item and we support that recommendation with Attachment 2 which corroborates our view.

Very truly yours,

  
B. R. Sylvia  
Manager - Nuclear  
Operations and Maintenance

Attachments

cc: Mr. Robert A. Clark, Chief  
Operating Reactors Branch No. 3

Mr. B. Joe Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

8010010 249

ATTACHMENT 1

SUPPLEMENTAL RESPONSE TO NOTICE OF  
VIOLATION ITEM REPORTED IN IE INSPECTION  
REPORT NOS. 50-338/80-25 AND 50-339/80-26

Corrective Action Taken:

The procedure in question was revised and sodium bisulfite is now utilized in the milk sample preservation technique.

Date Full Compliance Was Achieved:

July 2, 1980.

July 16, 1980

NOTED 21 JUL 1980 S.P.S.

Mr. D. Hopper  
Virginia Electric and Power Co.  
North Anna Power Station  
P O Box 402  
Mineral, VA 23117

NOTED JUL 21 1980 W.W.C.

Dear Mr. Hopper:

In the attached table are our results of stable iodide content in VEPCO milks from February 1979 through June 1980. The pre-June 1980 samples have concentrations between  $< 0.03$  (listed as 0.0) and 0.77 mg/liter while the June 1980 values were between 0.56 and 0.81. In the former case there are 46 results; in the latter, only three. Since there are only three results representing no addition of formaldehyde I believe it is too early to draw a conclusion, especially since there are a few formaldehyde results in the range of the June 1980 results.

My interpretation of the Health Physics article by Montgomery and Gibson is that there can be a protein-bound iodine problem with milk samples using formaldehyde but that the data in the article is insufficient, even by the admission of the authors, to extrapolate the results to a generalization of the issue. For example, according to the article the temperature of the milk at the time of the addition of formaldehyde can have a significant affect on the protein-binding. The authors also admit that milk from other areas of the country (as opposed to the Cincinnati, Ohio area)..."may differ in oxidase activity, stable iodide concentration and other constituents that could affect protein binding of formaldehyde-preserved milk".

Therefore as I mentioned in the first paragraph that I would consider it too soon after the change of the sample collection procedure of not adding formaldehyde to pass judgement on this issue.

Sincerely,

*J. David Martin*

J. David Martin, Manager  
Environmental Analysis Department

JDM:al  
Enclosure