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TRUTH IN POWER
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Va. Rch. Va. 23455

'The land we walk is only ours on loan.'

January 24, 1979

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Docketing & Service Section
Washington, D.C. 20555

Re: Hearing and Environmental
Impact Statement for Surry
Generator Replacement

50-280

In the Matter of Virginia Electric and Power Company
Surry Nuclear Power Station, Units 1 and 2
Docket Nos. 50-280 and 50-281

Dear Sir:

Enclosed is a copy of a letter sent to you by the North Anna Environmental Coalition requesting an Environmental Impact Statement be done at VEPCO's Surry, Va. plant before they replace the steam generator.

NAEC's letter raises many important questions that need to be addressed.

How much radiation will the workers be exposed to, and which manrem estimate is the most likely? How will it affect the migrant workers and residents in the area?

If Westinghouse has not yet completed it's study on comparative dose estimates between "retubing" and replacing steam generators, how is it possible to even make a decision?

Truth In Power respectfully requests along with NAEC that the Commission prepare a complete Environmental Impact Statement on VEPCO's proposed steam generator replacement at Surry, and that public hearings be held requiring VEPCO to justify why such a potentially hazardous and unproven procedure be allowed at Surry. We also ask the public hearing be widely noticed throughout Virginia.

Thank you.

Respectfully,

Truth In Power

enclosure

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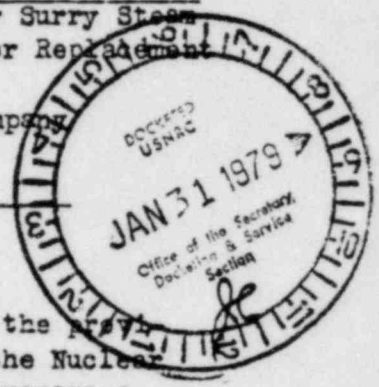
NORTH ANNA ENVIRONMENTAL COALITION

Charlottesville, Virginia
December 29, 1978

Mailing Address: 412 Owens Drive
Huntsville, Alabama 35801
(205) 536-0678

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Docketing & Service Section
Washington, D. C. 20555

Re: Hearing and Environmental Impact Statement for Surry Steam Generator Replacement



In the Matter of Virginia Electric and Power Company
Surry Nuclear Power Station, Units 1 and 2
Docket Nos. 50-230 and 50-281

Dear Sir:

This letter is addressed to you in accordance with the provisions of 10 CFR 2.206 and 10 CFR 51.50 to request that the Nuclear Regulatory Commission (NRC) conduct a full hearing and prepare a complete Environmental Impact Statement (EIS) on VEPCO's proposed steam generator replacement at its Surry Nuclear Power Station.

There is no question but what this experimental remedial procedure represents "an unreviewed safety question" in accordance with 10 CFR 50.59, and is "a significant licensing step" in terms of the ACRS discussion of October 28, 1978 (Tr. 38 - 39).

Nevertheless, despite the fact that VEPCO's proposal to remove and replace defective Westinghouse steam generators is the first procedure of its kind in the country and represents an attempt to solve an industry-wide problem involving malfunction and radiation exposure, NRC did not issue a news release on October 21, 1977 for public hearing.

The only notice that NAEC can discover is Mr. Case's letter of that date to the Federal Register, read by few if any affected citizens in the Surry area, and seen for the first time by NAEC just a few weeks ago when Surry's Project Manager kindly mailed the Coalition a requested copy. NAEC requested the copy after learning that the significant hazards consideration of steam generator replacement could (and should) be preceded by a public hearing, per the 10-28-78 ACRS transcript, page 122-3:

DR. ISBIN: Do you expect requests for a public hearing on this action?

MR. BENTON: No. I believe the comment period for that action has already expired.

The foregoing exchange led the Coalition to make the above request for a hearing on this major modification planned for the Surry nuclear plant, a modification which certainly involves the "possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report..."

Study of the ACRS Surry Subcommittee transcript of October 28 makes it clear that the Surry procedure involves multiple unknowns at every stage of the undertaking, including, but not limited to:

> "...occupational radiation exposure, airborne radioactive releases, liquid and solid waste handling, disposal of steam generator lower assemblies and the tubing, and radiological consequences of postulated accidents..." (Tr. 5)

It is generally acknowledged that welding the reactor coolant pipe will give the highest radiation exposure to the workers involved, but total dosage estimates vary widely: VEPCO estimates only 2070 manrem per unit whereas "the Battelle study ran 3300 to 5500." (Tr. 33)

How will the radiological dose be distributed, ACRS asks.

> DR. ISBIN: What is the relationship here to transient workers?...Isn't the staff looking in general at this problem? Have you reached some position?
>
> MR. BARRETT: ...I believe there are changes to part 20 forthcoming. I do not believe that they have been issued yet on transient workers. I am sorry. I can't give you much of the details. (Tr.48/9)

Thus it is evident that needed regulations lag behind the nuclear situations requiring them. Similarly, we find on page 19 that it will be months before Westinghouse completes its report on comparative dose estimates between "retubing" and replacing steam generators.

On page 18, Mr. Grimes speaks of "the time scale that is desired by this utility" as if the NRC were powerless to insist upon studies' being completed, environmental impact statements prepared, public hearings held, and significant hazards confronted before any major and experimental modification is allowed at a nuclear plant. It is our understanding that NRC Regulations require a licensing procedure before a utility is permitted to go forward with such a significant licensing step.

Thus the Coalition respectfully repeats its request that the Commission prepare a thorough Environmental Impact Statement on VEPCO's proposed steam generator replacement at Surry, and that the Commission hold a public hearing at which VEPCO is required to show cause as to why such a hazardous and unproven procedure should be allowed at the Surry station. We further ask that the public hearing be widely noticed in Virginia. Thank you for your professional consideration.

Sincerely,

NORTH ANNA ENVIRONMENTAL COALITION