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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

August 31, 1984

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. T. T. Martin, Director
Division of Engineering & Technical
Programs

Gentlemen:

The routine safety inspection transmitted by Inspection Report 50-317/84-09; 50-318/84-09, identified one item of apparent noncompliance with NRC regulations. The area of apparent noncompliance concerned the Plant Operations & Safety Review Committee (POSRC) review of Chemistry and Radiochemistry Procedures. The POSRC subsequently reviewed this issue and concluded that our current policy for procedure review complies with the requirements of Regulatory Guide 1.33, Appendix A, Section 10, (Revision 2 dated 1978), and that no violation of Appendix A, Technical Specification 6.5.1.6 occurred.

Technical Specification 6.8 requires the POSRC to review all procedures recommended in Regulatory Guide 1.33, Appendix A before implementation. Chemical and Radiochemistry control procedures, as defined in the Regulatory Guide, are reviewed by the POSRC. These procedures delineate the type of sampling, frequency, and analyses to be performed. The details of the implementing process (i.e., analytical and instrument procedures) are contained in a subordinate level of procedures which are not reviewed by POSRC. Regulatory Guide 1.33 does not require POSRC review of these sub-tier procedures. These sub-tier procedures are subject to audits and the POSRC periodically reviews the results of such auditing activities. This audit function covers laboratory procedures and practices for chemistry, radiochemistry, and laboratory instrumentation. Therefore, we feel the POSRC performs an adequate review of the "program controls" and that the POSRC responsibilities in this area are in full compliance with the intent of the Technical Specifications.

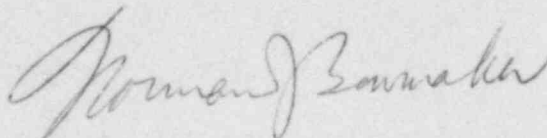
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Mr. Thomas T. Martin
August 31, 1984
Page 2

Based on the information provided above, we request you reconsider the issuance of the subject item of noncompliance. Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,



for A. E. LUNDVALL, JR.

AEL/SRC/gla

cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC