

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



VIRGINIA POWER

April 10, 1996

Ms. Lisa McMillan
Analytical Chemist
Virginia Department of Environmental Quality
OWRM - WQAP
P.O. Box 10009
629 E. Main Street
Richmond, VA 23240-0009

RE: DMR-QA RESULTS FOR VIRGINIA POWER FACILITIES

Dear Ms. McMillan:

We have carefully evaluated the data contained in the Discharge Monitoring Report-Quality Assurance (DMR-QA) report dated February 5, 1996, where results were judged to be unacceptable. A check was made at each facility for potential sources of error and we have determined the following:

North Anna Power Station (Permit No. VA0052451)

After thorough review of the laboratory procedures and Quality Control program for total recoverable chlorine (TRC) as well as recent tests with "blind" TRC samples, we have concluded that technician error in the dilution of the TRC sample from the ampule resulted in the unacceptable result. While the technician is trained and qualified on an approved procedure for analyzing TRC, the 1995 study was the first that this technician had participated in, and thus, the first time the technician had to prepare and dilute a standard from an EPA ampule.

We provide the following information in making this conclusion:

- The test equipment history for the instrument used for TRC was reviewed and no problems were noted.
- The linearity curves for the instrument prepared before and since the DMR-QA test were reviewed for consistency and no inconsistencies were found.

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- The Quality Control logs for the period before and since the test were reviewed; the 1.0 mg/l QC standard was found to be consistently analyzed between 0.90 and 1.10 mg/l.
- The deionized water used for dilution of QC samples was recently analyzed for TRC and found to be chlorine-free.
- A test sample that was previously obtained from the EPA was prepared and analyzed. The technician was not allowed to know the concentration or the range of the sample. The technician reported the result as 0.30 mg/l; the made-to-contain value was 0.301 mg/l. Additionally, a new test sample was obtained from the EPA on 3/29/96. Under the same circumstances, the technician analyzed the sample and reported the result as 0.65 mg/l; the made-to-contain value was 0.654 mg/l. Both of these results are well within the acceptance ranges that accompanied the samples.

In order to ensure improved performance on future DMR-QA TRC analyses, we will purchase commercially-prepared, known standards to analyze in conjunction with the DMR-QA samples and our QC standard. When the actual DMR-QA samples are prepared and analyzed, an appropriate independent reviewer will observe the process to ensure the EPA's directions are carefully followed.

Yorktown Power Station (Permit No. VA 0004103):

In July, 1995 the Yorktown Chemistry Department analyzed a DMR-QA sample for its pH value. A result of 8.3 was obtained but the true value of the pH is now known to be 9.0 based on the EPA DMR-QA report of February 5, 1996. Shortly after the DMR-QA sample was analyzed a faulty pH electrode was discovered and subsequently replaced. Following the replacement of the pH electrode a Virginia Power system quality assurance sample was analyzed for pH and the resulting value was 7.99. The true value of the sample was 8.00.

Considering the information discussed above we feel the cause for the erroneous DMR QA pH value has been discovered and corrected.

Ms. Lisa McMillan

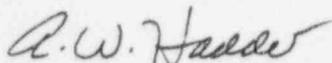
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All Virginia Power laboratories take pride in their ability to perform accurate analyses contributing to the success of our NPDES program. They will strive to improve, however and wherever feasible. An internal quality assurance program utilizing check samples three times per year is in place and we believe that this program assures that all of our laboratories are performing with a high degree of precision and accuracy.

If you have additional suggestions of how to improve our programs, or if you have any questions regarding the information provided, please feel free to contact Mr. David Yaworsky of my staff at (804)796-2694.

Sincerely,



A. W. Hadder

Manager

Environmental Policy & Compliance

cc:

U.S. Nuclear Regulatory Commission

Region II

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RE: North Anna Units 1 and 2

Docket Nos. 50-338/50-339

License Nos. NPF-4/NPF-7

U.S. Nuclear Regulatory Commission

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Washington, D.C. 20555

RE: North Anna Units 1 and 2

Docket Nos. 50-338/50-339

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Mr. R. D. McWhorter

NRC Senior Resident Inspector

North Anna Power Station