



HILDA HOWLAND M. MASON  
Councilmember at Large

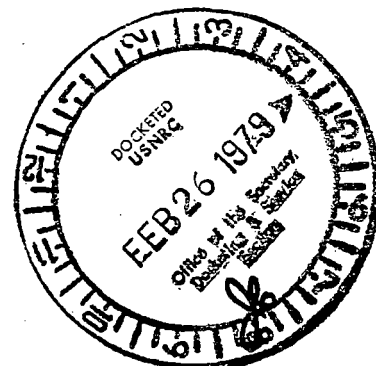
COUNCIL OF THE DISTRICT OF COLUMBIA

WASHINGTON, D. C. 20004

February 16, 1979

Req. Fac Br  
DOCKET NUMBER  
READ & UTIL. FAC 50-250-281

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



Dear Sir:

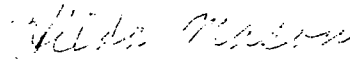
As a native Virginian and a former resident of the Chesapeake Bay area, I have recently become aware of the risks associated with VEPCO's imminent replacement operation for the steam generators at the Surry atomic power station. As I understand the situation, even though this unique \$127 million operation will involve considerable radiation exposures to the environment and to workers, the following facts seem clear:

1. There has been no Environmental Impact Statement.
2. There has been no public hearing.
3. The Virginia State Health Department has had no input in the decision-making.
4. A Nuclear Regulatory Commission spokesman, Dr. Barrett, is on record (in the October 28, 1978 meeting of the Advisory Committee on Reactor Safeguards) as characterizing VEPCO's commitment to "ALARA" standards for radiation exposure as "weasel-worded."
5. VEPCO specifically stated at the same meeting that it did not plan to observe in all respects the applicable Nuclear Regulatory Commission regulations (specifically Regulatory Guide 8.8).
6. VEPCO has also specifically decided not to use decontamination procedures and the manufacturer recommended retubing option which would reduce worker exposures to radiation.

Secretary of the Commission  
page two

It seems that in this case the Nuclear Regulatory Commission has issued a license amendment for this procedure with undue deference to the time frame desired by the utility and with little substantive public input, contrary to the spirit of the Commission's own regulations. I urge that the Commission review the February 1, 1979, denial of Ms. June Allen's Section 2.206 "show cause" petition and allow further consideration of this matter by appropriate Nuclear Regulatory Commission officials and the concerned public.

Sincerely,



HILDA HOWLAND M. MASON  
Councilmember at Large

HM/em

Feb. 19, 1979

Dr. Robert Jackson  
Virginia State Health Dept.  
Richmond, Va.

Dear Dr. Jackson,

I am writing to you in regard to the events now taking place at Vepco's Surry station, that is, their replacement of the radioactive steam generators.

Because of the large radiation release and the known dangers to the involved workers, I believe this should be a matter of concern to the State Health Dept.

Vepco has admitted rushing into the replacement option before all the studies were completed, yet the procedure has never been attempted before.

Radiation exposure is a very serious problem and a very real possibility. Public hearings, both State and Federal, should be held concerning this matter, since the replacement of the steam generators is also being contemplated at Turkey Point (Fla.) and Palisades.

Respectfully,

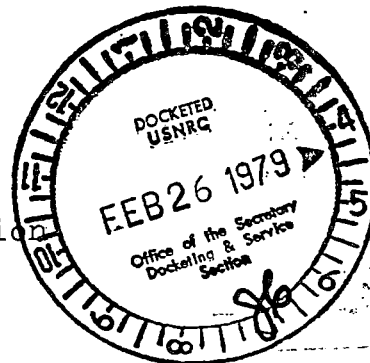
*Rebecca West*

Copies to:

Rep. Morris Udall  
U.S. House of Reps.  
Washington, D.C.

Sen. Gary Hart  
U.S. Senate  
Washington, D.C.

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



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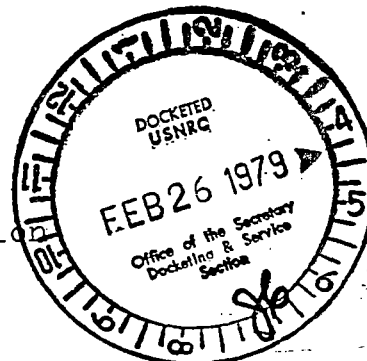
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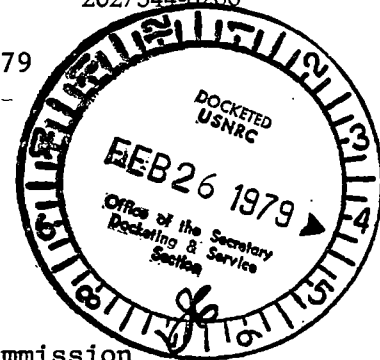
Sen. Gary Hart  
U.S. Senate  
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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



**Environmental Policy Institute**  
317 Pennsylvania Ave. S.E. Washington, D.C. 20003  
202/544-8200

February 20, 1979



Hon. Joseph Hendrie, Chairman  
U.S. Nuclear Regulatory Commission  
1717 H Street, N.W.  
Washington, D.C. 20555

Dear Commissioner Hendrie:

The Environmental Policy Institute requests that the Commission reconsider the issuance of Amendment Nos. 46 and 47 to Facility Operating License Nos. DPR-32 and DPR-37 issued to Virginia Electric and Power Company (VEPCO) for replacement of the steam generators at Surry Power Station Unit Nos. 1 and 2.

We request review of the procedures by which the amendments were granted and the convening of a public hearing on the amendments. Notice of the proposed issuance of the amendments (44 FR 4057, January 19, 1979) was published only one day prior to the actual issuance of the amendments which were effective immediately upon issuance. Notice of issuance, which took place on January 20, 1979, was not published until January 29, 1979 (44 FR 5735).

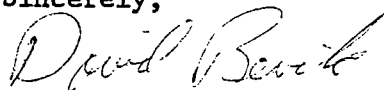
We request review of the negative declaration made in the Environmental Impact Appraisal issued January 20, 1979 concerning the steam generator replacement and request the completion of a full environmental impact statement. The Appraisal rejected analysis of the radiologic impact made by Battelle Northwest Laboratories published as NUREG/CR-0199 "Radio-logic Assessment of Steam Generator Removal and Replacement." The Appraisal found that differences between VEPCO's analysis and NUREG/CR-0199 of man/rem occupational exposures could be easily reconciled. NUREG/CR-0199 clearly notes that it considered both the VEPCO and Florida Power and Light analyses of steam generator replacement and that the substantial differences remained in the analysis. The Commission accepted without qualification VEPCO's estimate of 2,070 man/rem per unit while NUREG/CR-0199 showed potential exposures to be between 3,380 man/rem and 5,840 man/rem per unit. Furthermore, the Commission compared the occupational exposure to exposures encountered with repair and maintenance of defective steam generators, rather than with normal maintenance exposures, to justify high exposures. Finally, the Commission in its negative declaration found that releases to the environment were expected to be less than those resulting from normal operation and therefore they were without significant impact. The Commission must analyze the environmental impact based upon actual release and pathway analysis and not by comparison to normal operation.

We request that no steam generator replacement activities be approved until the pending transient worker exposure regulations are promulgated (43 FR 4865, February 6, 1978, Proposed Rule). The 3,380 man/rem to 5,840 man/rem per unit occupational exposure estimates made in NUREG/CR-0199 represent extremely high exposure rates. These estimates, extended over the

Surry units and Florida Power and Light's Turkey Point plant and Consumers Power's Palisades plant, which have applications pending for steam generator replacement, represent a very large number of transient worker exposures.

Finally, we request a complete review of the Commission's treatment of steam generator repair and replacement activities at pressurized water reactors. This review should be extended to include expected steam generator repair and replacement exposures over the lifetime of these units and design requirements to reduce steam generator maintenance exposures.

Sincerely,



David Berick



Bob Alvarez

DB:ejw

cc: Hon. Gary Hart

Hon. Morris K. Udall✓

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

VIRGINIA ELECTRIC AND POWER )  
COMPANY )

Docket No.(s) 50-280  
50-281

(Surry Power Station,  
Units 1 and 2) )  
)  
)  
)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Dated at Washington, D.C. this

27th day of Feb 1979.

Regina T. Downing  
Office of the Secretary of the Commission

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

VIRGINIA ELECTRIC AND POWER )  
COMPANY )

(Surry, Units 1 and 2) )  
)  
)

Docket No.(s) 50-280  
50-281

SERVICE LIST

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Washington, D.C. 20555

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