

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

December 20, 1985

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

Mr. James M. Taylor, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Serial No. 85-700  
NO/JBL/vlh  
Docket Nos. 50-280  
50-281  
50-338  
50-339  
License Nos. DPR-32  
DPR-37  
NPF-4  
NPF-7

Dear Mr. Taylor:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION  
NORTH ANNA POWER STATION  
RESPONSE TO NRC LETTER CONCERNING A GENERAL PHYSICS  
CORPORATION INTEGRATED LEAK RATE TEST TRAINING COURSE

Virginia Electric and Power Company has reviewed your letter of September 13, 1985 regarding material that was provided in an integrated containment leak rate testing course given by General Physics Corporation. Your letter indicated that a Virginia Electric and Power Company employee was among 25 participants from 6 utilities who attended the General Physics training course. Your letter further stated that General Physics distributed material during the training course which appears to suggest or condone practices that could be misleading to the NRC program of inspection. The questionable material was attached to your letter as Enclosure 1.

Based upon information obtained from General Physics, it appears they presented this course on two occasions; the first at Oyster Creek on November 29 and 30, 1983, and the second at their Columbia, Maryland office on March 1 and 2, 1984. The training course material handed out at the November, 1983 course was the same as that which was attached to your September 13, 1985 letter. However, between November, 1983 and March, 1984 the training course material was reviewed and revised by General Physics to remove the questionable material.

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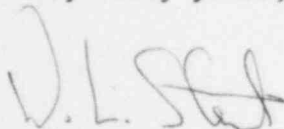
Because the Virginia Electric and Power Company employee identified in your September 13, 1985 letter attended the March, 1984 training course and received the revised training course material, we believe the NRC was incorrect in stating that our employee had been instructed to be anything but open and candid with NRC representatives.

I have personally discussed this matter with the employee. We reviewed both sets of course material and your letter of September 13, 1985. He has described to me that the instruction he received during the training course promoted open communication with the NRC and that he is aware that it is our company's policy for all personnel to be open and candid with the NRC.

With respect to the training material attached to your letter on integrated leak rate testing and your request for our comments on the allegation of the "traditional industry approach", we feel that the statements made were erroneous and not representative of either Virginia Electric and Power Company or the nuclear industry. Although we cannot offer an opinion as to how individual utilities approach their regulatory interfaces, we can assure you that these practices are not the approach of Virginia Electric and Power Company.

As a management philosophy, Virginia Electric and Power Company nurtures within its employees a sense of professionalism, personal integrity and responsibility. This philosophy is a most effective way to promote openness and candor in all communications with the NRC.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W. L. Stewart". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

W. L. Stewart

cc: Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulatory

Dr. J. Nelson Grace  
Regional Administrator  
NRC Region II

Mr. Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing-A

Mr. Terence L. Chan  
NRC Surry Project Manager  
PWR Project Directorate #2  
Division of PWR Licensing-A

Mr. Leon B. Engle  
NRC North Anna Project Manager  
PWR Project Directorate #2  
Division of PWR Licensing-A

Mr. Donald J. Burke  
NRC Resident Inspector  
Surry Power Station

Mr. M. W. Branch  
NRC Resident Inspector  
North Anna Power Station