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Everett P. Perkins, Jr.
Director, Nuclear Safety Assurance
Waterford 3

W3F1-2000-0051
A4.05
PR

April 28, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Annual Environmental Operating Report - 1999

Gentlemen:

Attached is the 1999 Annual Environmental Operating Report for Waterford 3. This report is submitted pursuant to Subsection 5.4.1 of the Environmental Protection Plan (Appendix B to the Operating License).

Should you have any questions regarding this report, please contact G. Chris Pickering at (504) 739-6256 or Oscar Pipkins at (504) 739-6707. The commitment contained in this submittal is identified on the attached Commitment Identification/Voluntary Enhancement Form.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Everett P. Perkins, Jr.", with a long horizontal flourish extending to the right.

E.P. Perkins, Jr.
Director
Nuclear Safety Assurance

EPP/GCP/OPP/ssf

Attachments: Annual Environmental Operating Report - 1999
Commitment Identification/Voluntary Enhancement Form

Handwritten initials "JEC25" in a cursive script, located in the bottom right corner of the page.

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cc: E.W. Merschoff, NRC Region IV
N. Kalyanam, NRC-NRR
J. Smith
N.S. Reynolds
R.H. Gibson (EPA)
L.K. Levy (LA DEQ)
NRC Resident Inspectors Office

WATERFORD 3 1999 ANNUAL ENVIRONMENTAL OPERATING REPORT

This report describes implementation of the Environmental Protection Plan (EPP) for the calendar year 1999, and provides the information required by the EPP.

A. Summaries and analyses of the results of the environmental protection activities required by EPP subsection 4.2:

This section of the EPP provides protection of the two cultural resources areas on the Waterford 3 site. There were no activities which affected either the Plantation Overseer's House site or the Plantation Quarter's site, both eligible for the National Register of Historic Places, during this reporting period.

B. EPP noncompliance's and the corrective actions taken to remedy them:

There was one noncompliance's with the requirements of the EPP during this reporting period. Section 3.2 of the EPP requires that changes made to, or renewals of, the Louisiana Pollutant Discharge Elimination System (LPDES) permit be reported to the NRC within 30 days. Two modifications to LPDES permit LA0007374 were performed in 1999 and issued without making the required 30 day notifications. This deficiency in reporting is being addressed within the plant's corrective action program; and the notification of the changes made to LPDES permit LA0007374 will be submitted to the NRC via letter.

- C. A discussion of changes in station design or operation, tests, or experiments made in accordance with the EPP subsection 3.1 which involved a potential significant unreviewed environmental question:

During the reporting period, two station changes were reviewed to ensure that a potential significant unreviewed environmental question did not exist:

Design Change DC-3521, Route Dry Cooling Tower (DCT) Sumps Discharge to Circulating Water System, was reviewed. This change provides the ability to discharge effluent via the circulating water system, thence to the Mississippi River in addition to its previous pathway to the 40 Arpent Canal, thence to Lac Des Allemands. This change was done in order to provide a more suitable pathway for low level radioactive constituents that have appeared in the effluent stream. The evaluation identified that the NPDES permit would need to be modified to allow discharges via this new pathway. The water discharge permit was modified to include such discharges via the circulating water system and issued by the Louisiana Department of Environmental Quality (LDEQ) on 2/1/1999 (Permit Number LA0007374). Thus, no significant unreviewed environmental questions exist for DC-3521.

ER-W3-99-1032-00-00, Temporary Alteration for New Auxiliary Boiler, was reviewed. This change replaces the originally installed auxiliary boiler with a temporary replacement boiler. This change is necessary since the originally installed boiler has failed. This temporary configuration will be required until a replacement boiler can be permanently installed. Necessary changes were made to the air emissions permit and issued by the Louisiana Department of Environmental Quality (LDEQ) on 5/30/1995 (Permit Number 1255 M-1). The air emissions were determined to be slightly less than those for the originally installed boiler. Ambient noise impacts in the surrounding area were evaluated to be equivalent to the originally installed boiler. The temporary auxiliary boiler does not have curbing with controlled drainage as for the originally installed boiler. Booms are installed to prevent spilled substances from reaching waters of the state per LAC 33:IX.907. Furthermore, the fuel oil supply is isolated whenever the temporary auxiliary boiler is not operating. These precautions will limit the possibility of accidental draining of fuel oil. Thus, no significant unreviewed environmental questions exist for ER-W3-99-1032-00-00.

D. Nonroutine reports submitted in accordance with subsection 5.4.2:

During the reporting period, there was one nonroutine report submitted in accordance with subsection 5.4.2 during the reporting period:

In a letter to the LDEQ, dated February 2, 2000, a notification of a non-compliance with the specific conditions in Air Permit 1255 M-1, for emission point number 2-95, Auxiliary Boiler, was reported. The air permit limits the hours of operation for this specific source to 180 hours during any twelve month period. Contrary to this requirement, the auxiliary boiler was operated for 450.4 hours. The cause of the non-compliance was due to four forced shutdowns at the Waterford 3 SES during 1999, which caused the auxiliary boiler to be operated more than usual. In order to reduce/eliminate the noncompliance and to prevent future recurrences, Waterford-3 will request additional run time hours in the air permit that includes anticipated operational occurrences for all equipment (including operation during start-ups, shutdowns, emergencies, and maintenance).

COMMITMENT IDENTIFICATION/VOLUNTARY ENHANCEMENT FORM

Attachment 2 to W3F1-2000-0051
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COMMITMENT(S)	ONE-TIME ACTION*	CONTINUING COMPLIANCE*	SCHEDULED COMPLETION DATE (IF REQUIRED)	ASSOCIATED CR OR ER
The notification of the changes made to LPDES permit LA0007374 will be submitted to the NRC via letter.	X			CR-WF3-2000-0388

*Check one only

VOLUNTARY ENHANCEMENT(S)	ASSOCIATED CR OR ER