



# PECO NUCLEAR

A Unit of PECO Energy

PECO Energy Company  
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September 27, 2000

Mr. James Newbold  
Regional Manager Water Management  
Pennsylvania Department of Environmental Protection  
Southeast Regional Office  
Suite 6010, Lee Park  
555 North Lane  
Conshohocken, PA 19428

SUBJECT: Limerick Generating Station, Bradshaw Reservoir NPDES Permit  
PA0052221 Non-Compliance

Dear Mr. Newbold:

## DESCRIPTION OF THE NON-COMPLIANCE

During the month of August 2000, the Bradshaw Reservoir NPDES limit for fecal coliform concentration was not met. The permit requires five consecutive grab samples each collected on different days, and the geometric mean of the five samples must be less than or equal to 200 colonies per 100 ml. An Ozone Disinfection System is utilized for treatment at the Bradshaw Reservoir Water Processing Facility.

On August 29, 2000, the geometric mean of the fecal coliform concentration was calculated to be 276 colonies per 100 ml, thereby exceeding the NPDES permit limit.

## CAUSE OF THE NON-COMPLIANCE:

The August 2000 non-compliance occurred in the following manner. Two of the samples taken were within the limits imposed by the NPDES permit. The other three, occurring on August 2, August 21 and August 29, were greater than the 200 colonies per 100 ml limit. During this period the ozonation system was operating at maximum capacity and the ozonation system was checked to ensure that the system was optimized. The non-compliance was attributed to high river flows due to heavy rainfall during the month.

## CORRECTIVE ACTIONS TAKEN:

No additional sampling was performed. The first three fecal coliform samplings in September showed an average of 16 colonies per 100 ml, which are within the limits of the NPDES permit.

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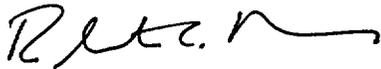
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CORRECTIVE ACTIONS TAKEN TO PREVENT RECURRENCE:

No further actions are being taken at this time. The non-compliance is attributed to the extreme weather conditions in eastern Pennsylvania.

If you have any questions please do not hesitate to contact Mr. Douglas Wahl at (610) 718-2733.

Sincerely,



Robert C. Braun  
Plant Manager

RCB/dew

cc: U. S. Nuclear Regulatory Commission  
Document Control Desk  
Docket Nos. 50-352/353  
Washington, D.C. 20555

H. J. Miller  
Administrator, Region I, USNRC  
Docket Nos. 50-352/353

A. L. Burritt  
USNRC Senior Resident Inspector, LGS  
Docket Nos. 50-352/353

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