



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point 3 NPP
P.O. Box 308
Buchanan, NY 10511
Tel 914 736 8001 Fax 736 8012

Robert J. Barrett
Vice President, Operations-IP3

March 12, 2001
IPN-01-021

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop 0-P1-17
Washington, D.C. 20555-0001

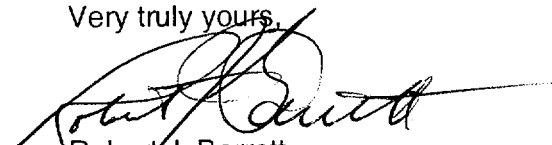
SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
State Pollutant Discharge Elimination System (SPDES) Permit Reports

Dear Sir:

The purpose of this letter is to transmit copies of reports on violations of the SPDES Permit and modifications to the SPDES Permit for the year 2000 in accordance with Section 3.2 of the Non-Radiological Environmental Protection Plan Technical Specifications. Attachment 1 contains reports on violations of the SPDES Permit. In accordance with NRC Staff request, these include excursions from the SPDES Permit effluent limits, regardless of whether or not the excursion resulted in a Notice of Violation by the New York State Department of Environmental Conservation (NYSDEC). Attachment 2 contains a November 20, 2000 SPDES permit modification that was issued as part of the transfer of ownership of Indian Point 3. The Annual Environmental Protection Plan Report for the Indian Point Station, scheduled for submittal by May 1, 2001, will discuss why this modification was not forwarded within the 30 day period required by our Technical Specifications.

If you or your staff have any questions regarding this matter, please contact Mr. Ken Peters at (914) 736-8029. Entergy is making no commitments in this letter.

Very truly yours,



Robert J. Barrett
Vice President Operations
Indian Point 3 Nuclear Power Plant

cc: see next page

0001

Attachments as stated

cc: Mr. Hubert J. Miller
Regional Administrator
Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Mr. George Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
U.S. Nuclear Regulatory Commission
Mail Stop 8C4
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Indian Point 3 Nuclear Power Plant

Docket No. 50-286
Attachment 1
IPN-01-021

SPEDES Permit Violations For Year 2000

February 24, 2000

Review
4-27
E



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of January 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452.

Very truly yours,

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Enc.

/paa

Review
4-27-00
OK

March 17, 2000



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of February 2000. Two separate event reports are attached for non-compliance. One report of non-compliance is associated with maintenance of the required head differential in the site discharge canal. The second event is associated with an occurrence at the New York Power Authority Unit 3 Facility.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452.

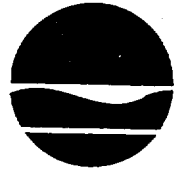
Very truly yours,

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Enc.

SECTION 1

*New York State Department of Environmental Conservation
Division of Water*



Report of Noncompliance Event

To: DEC Water Contact Cesare Manfredi DEC Region: 3

Report Type: 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-0004472 Facility: New York Power Authority - Indian Point 3

Date of Noncompliance: 2/18/00 Location (Outfall Treatment Unit, or Pump Station): 001

Description of Noncompliance(s) and cause(s): On 2/18 at 9 am, it was noted that we were unable to maintain the required 1.75 foot head differential between the discharge canal and the river height. The fall in canal level was the result of the securing of the 3 running circulating water pumps at IP2. Attempts to adjust the ports to achieve the 1.75 feet, within the required four hours were unsuccessful.

Has event ceased? (Yes) (No) If so, when? 4-6 pm Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 2/18/00 9:00 (AM) (PM) End date, time of event 2/18/00 6:00 (AM) (PM)

Date, time oral notification made to DEC? N/A (AM) (PM) DEC Official contacted: _____

Immediate corrective actions: Temporarily increased flow and then initiated manual manipulation of the gates at the discharge ports.

Preventive (long term) corrective actions: Investigation and repair of the motors designed to move the gates. Also, we plan to initiate a routine preventative maintenance activity which will include periodic movement of the gates help prevent future binding of the gates.

SECTION 3

Complete this section if the event was a bypass:

Bypass Amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: _____

Describe event in "description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Ken Peters Title: Licensing Manager Date: 3/3/00

Phone #: (914) 736-8029 Fax #: (914) 736-8769

Mr. John Marra
NYSDEC
SPDES Permit Program
50 Wolf Road
Albany, NY 12233

Re: 5-day Non-compliance Report SPDES # NY0004472

As required general condition 5.b. of the above-referenced SPDES permit, Con Edison is providing written non-compliance notification. Con Edison first became aware of the circumstances on February 26, 2000.

On February 26 at approximately 1220 hrs, the New Power Authority (operator of Indian Point Unit 3) noticed a release of domestic sewage from a ruptured clean out plug. The sewage spilled out onto an asphalt parking lot and approximately five (5) gallons of sewage entered a storm drain which empties into the discharge canal, which discharges to the Hudson River at Buchanan, NY. NYPA operations (V. Declemente) notified NYSDEC Region 3 (Ms. Wehrfrick) on Feb 26 regarding the 5 gallon sewage release.

The ruptured line was isolated and the clean out plug replaced. All sewage that did not enter the discharge canal was contained on an asphalt parking lot and placed in 55 gallon drums. The sewage was removed by a vendor with a permit to discharge the sewage to the sewage treatment facility in Buchanan, NY.

If you require additional information, please call me at (914) 271-7353 or e-mail me at keppelr@coned.com.

April 18, 2000



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

Kerns
5/1/00
(K)

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of March 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed. One event report is attached for a non-compliance associated with an occurrence at the Con Edison Unit 2 Facility.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452.

Very truly yours,

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Enc.

/paa

SECTION 1

New York State Department of Environmental Conservation
Division of Water

Report of Noncompliance Event

To: DEC Water Contact Cesare Manfredi DEC Region: 3

Report Type: 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-0004472 Facility: Con Edison - Indian Point Generating Station Units 1 & 2

Date of noncompliance: 03 / 27 / 00 Location (Outfall, Treatment Unit, or Pump Station) : Storm Water Discharge

Description of noncompliance(s) and cause(s): Water that was pumped out of one storm drain manhole was discharged to an adjacent storm drain manhole. The water that was transferred via this process was turbid. The storm drain system at the Indian Point site eventually discharges to the Hudson River.

Has event ceased? (Yes) (No) If so, when? 03 / 27 / 00 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 03 / 27 / 00 , 01 : 00 (AM) (PM) End date, time of event: 03 / 27 / 00 , 01 : 10 (AM) (PM)

Date, time oral notification made to DEC 03 / 27 / 00 , 01 : 10 (AM) (PM) DEC Official contacted: Mr. Stephen Sellinger

Immediate corrective actions: Storm water transfer operation was immediately ceased upon identification as a potential non-compliance event.

Preventive (long term) corrective actions: The process of transferring water out of the storm water manholes and directly into an outfall that eventually discharges to the Hudson River will not take place. It has been communicated to the work crews that this type of activity is not permitted.

SECTION 3

Complete this section if event was a bypass:

Bypass Amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: ____ / ____ / ____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Keith Barouch Title: Environmental Manager Date: 04 / 06 / 00

Phone #: (914) 734 - 5674 Fax #: (914) 736 - 5562

May 25, 2000

6-12-1
CE



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of ~~March~~ ^{APRIL} 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452.

Very truly yours,

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Enc.

/paa

June 28, 2000

2cm
7-18-0
CE



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of May 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452.

Very truly yours,

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Enc.

/paa

8-21-01
(68)

July 21, 2000



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of June 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914)736-8452.

Very truly yours,

Keith Barouch
Environmental Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Attachment

/paa

August 22, 2000



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: *Monthly Discharge Monitoring Report*
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of July 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914)736-8452.

Very truly yours,

A handwritten signature in black ink, appearing to read "Keith Barouch".

Keith Barouch
Environmental Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Attachment

/paa

September 18, 2000



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

A handwritten signature in black ink is located in the top right corner, overlapping the date. The signature appears to be "J. Burns" or similar, with a circular stamp or mark below it.

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of August 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds J. Burns of Con Edison (914)734-5605 or Mr. Matthew Kerns of New York Power Authority at (914)736-8452.

Very truly yours,

A handwritten signature in black ink is located in the middle right section of the page. The signature is cursive and appears to be "Keith Barouch".

Keith Barouch
Environmental Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Attachment

/paa

October 19, 2000

Reviewed
11-15-00
GJ



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

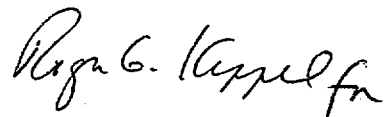
Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of September 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Thomas Teague of Con Edison (914)734-5791 or Mr. Matthew Kerns of New York Power Authority at (914)736-8452.

Very truly yours,


K. Barouch

Keith Barouch
Environmental Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Attachment

/paa

November 14, 2000

12/30
OK



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of October 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Thomas Teague of Con Edison (914)734-5791 or Mr. Matthew Kerns of New York Power Authority at (914)736-8452.

Very truly yours,

Keith Barouch
Environmental Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Attachment

/paa

December 18, 2000



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

Review
1-12-
C

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of November 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

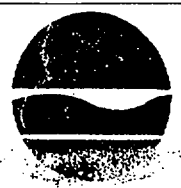
If you have any questions regarding this submission, please contact Mr. Thomas Teague of Con Edison (914)734-5791 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452.

Very truly yours,

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

Enc.

/pau



Report of Noncompliance Event

To: DEC Water Contact Cesare Manfredi DEC Region: 3

Report Type: 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 0004472 Facility: ENTERGY NUCLEAR NORTHEAST INDIAN POINT #3

Date of noncompliance: 11/18/00 Location (Outfall, Treatment Unit, or Pump Station): OUTFALL OIL

Description of noncompliance(s) and cause(s): THE WEEKLY BORON SAMPLE FROM OUTFALL OIL WAS MISSED FOR THE WEEKENDING 11/18/00. THIS OUTFALL DOES NOT HAVE CONTINUOUS DISCHARGE FLOW, THEREFORE THE WEEKLY GRAB SAMPLE IS OBTAINED FROM THE FIRST TANK RELEASED EACH WEEK. THE ONLY TANK RELEASED FOR THE WEEKENDING 11/18/00 WAS ON SATURDAY, AND A SAMPLE WAS COLLECTED FOR SUSPENDED SOLIDS ANALYSIS. THE TECHNICIAN COLLECTING THE SAMPLE ASSUMED THAT THE WEEKLY SAMPLE FOR BORON HAD ALREADY BEEN OBTAINED BECAUSE IT WAS SATURDAY.

Has event ceased? (Yes) (No) If so, when? _____ Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 1/1 (AM) (PM) End date, time of event: 1/1 (AM) (PM)

Date, time oral notification made to DEC? 1/1 (AM) (PM) DEC Official contacted: _____

Immediate corrective actions: THE WEEKLY BORON CONCENTRATION (FROM OUTFALL OIL) WAS ESTIMATED BASED ON THE PREVIOUS 3 MONTHS OF SAMPLE DATA. THE FINAL DISCHARGE CANAL BORON WAS CALCULATED USING THIS ESTIMATED VALUE AND IP3 OUTFALL FLOW. THE RESULT WAS WELL BELOW THE 10.0PPM DISCHARGE LIMIT.

Preventive (long term) corrective actions: ADDITIONAL METHODS WILL BE ESTABLISHED TO ENSURE ALL WEEKLY REQUIRED SAMPLES ARE OBTAINED AND PROPERLY IDENTIFIED FOR EACH REQUIRED ANALYSIS.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 1/1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: KEN PETERS Title: LICENSING MANAGER Date: 12/13/00

Phone #: (914) 734-8029 Fax #: (914) 736-8769

January 22, 2001

*DP
Revised
2-2-2001*



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
SPDES Compliance Information Section
Bureau of Watershed Compliance Programs
50 Wolf Road - Room 340
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #NY0004472
Con Edison - Indian Point Unit 1 and Unit 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of December 2000.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Thomas Teague of Con Edison (914)734-5791 or Mr. Matthew Kerns of New York Power Authority at (914) 736-8452 .

Very truly yours,

*Page 6 Keppel
for K. Barouch*

Keith Barouch
Env., Health & Safety Manager
Indian Point Station
Con Edison Units 1 & 2

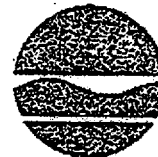
Enc.

/paa

Docket No. 50-286
Attachment 2
IPN-01-021

SPEDES Permit Modifications For Year 2000

New York State Department of Environmental Conservation
Division of Environmental Permits, Region 3
21 South Putt Corners Road, New Paltz, New York 12561-1696
Phone: (914) 256-3053 • FAX: (914) 255-3042
Website: www.dec.state.ny.us



John P. Cahill
Commissioner

November 20, 2000

Mr. Michael R. Kansler
Senior Vice President and Chief Operating Officer
Entergy Nuclear Indian Point 3, LLC
Bleakly Avenue and Broadway
Buchanan, New York 10511

Re: Indian Point Unit 3 Nuclear Power Station
(DEC No. 3-5522-00105/00008)

Permit Transfers and Modification

Dear Mr. Kansler:

Enclosed herewith please find an executed permit transfer which transfers the following permits to Entergy Nuclear Indian Point 3, LLC:

- Hazardous Waste Permit: DEC Permit No. 3-5522-00105/00008.
- Air Certificates to Operate: DEC Permit No. 3-5522-00105/0009.
- Protection of Water/ Water Quality Certification: DEC Permit No. 3-5522-00105/00019.
- State Pollutant Discharge Elimination System (SPDES): DEC Permit No. 3-5522/00011/4&8 (NY-0004472)

This letter also serves as approval of the SPDES modification request by the New York Power Authority to discharge stormwater runoff collected within a secondary containment structure associated with chemical bulk storage transfer station operations at the facility. This SPDES modification request was submitted on July 10, 2000 and determined to be complete on September 27, 2000. The approved permit pages (6 of 19, 12A of 19, 12B of 19, 12C of 19) are enclosed herewith. These pages should be incorporated into the original and all copies of the SPDES permit.

Entergy Nuclear Indian Point 3, LLC is responsible for maintaining all permits and complying with all terms and conditions contained in these permits. Renewal applications for SPDES and Hazardous Waste permits must be submitted at least 180 days prior to the expiration date.

Please feel free to call me at (845) 256-3053 if you have any questions regarding any of the permits or your obligations under these permits.

Sincerely,


William E. Steidle

Deputy Regional Permit Administrator

Mr. Michael R. Kansler
November 17, 2000
Page 2

Distribution (w/ permit transfer):

W. Slade, New York Power Authority (w/ modified SPDES pages)
Mayor, Village of Buchanan
Supervisor, Town of Cortlandt
P. Henner, Esq.
USEPA, Region 2 (w/ modified SPDES pages)
Westchester County Department of Health (w/ modified SPDES pages)
M. Moran
E. Stoutenburgh
D. Cordisco
R. Stanton
T. Killeen
J. Isaacs
A. Kahnle
C. Manfredi
J. Marcogliese (w/ modified SPDES pages)
J. Sama, Albany (1750)
R. Hannaford, Albany - 3505 (w/ modified SPDES pages)
P. Kolakowski, Albany - 3505 (w/ modified SPDES pages)
V. Gallo, Albany (1500)

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning November 20, 2000 and lasting until permit expiration
the discharges from the permitted facility shall be limited and monitored by the permittee as specified below:

Outfall Number & Effluent Parameter Type	Discharge Limitations		Units	Minimum Monitoring Requirements	
	Daily Avg.	Daily Max.		Measurement Frequency	Sample
<u>01K - Filter Backwash</u>					
Flow	Monitor	Monitor	GPD	Weekly	Instantaneous
<u>001C</u> Flow	Monitoring	Only	MGD	Monthly	Instantaneous
<u>001L - Condensate Polisher System Effluent and Stormwater Runoff from Chemical Bulk Storage Secondary Containment</u>					
Flow	Monitor	Monitor	GPD	Weekly	Instantaneous
pH	(Range 6.0-9.0)		SU	Monthly	Grab
Chlorine, Total Residual	NA	Monitor	mg/l	Monthly	Grab
<u>01N - Reverse Osmosis Reject</u>					
Flow	Monitor	Monitor	GPD	Weekly	Instantaneous
Oil & Grease	NA	15	mg/l	Weekly	Grab
Total Suspended Solids	30	50	mg/l	Weekly	Grab

002-009 - Uncontaminated Stormwater Discharge

No monitoring required

6. The BMP plan shall be documented in narrative form and shall include any necessary plot plans, drawings or maps. Other documents already prepared for the facility such as a Safety Manual or a Spill Prevention, Control and Countermeasure (SPCC) plan may be used as part of the plan and may be incorporated by reference. USEPA guidance for development of storm water elements of the BMP is available in the September 1992 manual "Storm Water Management for Industrial Activities," USEPA Office of Water Publication EPA 832-R-92-006 (available from NTIS, (703)487-4650, order number PB 92235969). A copy of the BMP plan shall be maintained at the facility and shall be available to authorized Department representatives upon request. As a minimum, the plan shall include the following BMP's:

- | | | |
|-------------------------------------|----------------------------|--------------------------------|
| a. BMP Committee | e. Inspections and Records | i. Security |
| b. Reporting of BMP Incidents | f. Preventive Maintenance | j. Spill prevention & response |
| c. Risk Identification & Assessment | g. Good Housekeeping | k. Erosion & sediment control |
| d. Employee Training | h. Materials Compatibility | l. Management of runoff |

7. The BMP plan shall be reviewed annually and shall be modified whenever: (a) changes at the facility materially increase the potential for significant releases of toxic or hazardous pollutants, (b) actual releases indicate the plan is inadequate or (c) a letter from the Regional Water Engineer highlights inadequacies in the plan..

8. Facilities with Petroleum and/or Chemical Bulk Storage (PBS and CBS) Areas:

Compliance must be maintained with all applicable regulations including those involving releases, registration, handling and storage (6NYCRR 595-599) and (6NYCRR 612-614). Stormwater discharges from handling and storage areas should be eliminated where practical.

a. Spill Cleanup - All spilled or leaked substances must be removed from secondary containment systems as quickly as practical and in all cases within 24 hours. The containment system must be thoroughly cleaned to remove any residual contamination which could cause contamination of stormwater and the resulting discharge of pollutants to waters of the State. Following spill cleanup the affected area must be completely flushed with clean water three times and the water removed after each flushing for proper disposal in an on-site or off-site wastewater treatment plant permitted to discharge such wastewater. Alternatively, the permittee may test the first batch of stormwater following the spill cleanup to determine discharge acceptability. If the water contains no pollutants it may be discharged. Otherwise it must be disposed of as noted above. See *Discharge Monitoring* below for the list of parameters to be sampled for.

b. Discharge Operation - Stormwater must be removed before it compromises the required containment system capacity. Each discharge may only proceed with the prior approval of the permittee staff person responsible for ensuring compliance with this permit. Bulk storage secondary containment drainage systems must be locked in a closed position except when the operator is in the process of draining accumulated stormwater. Transfer area secondary containment drainage systems must be locked in a closed position during all transfers and must not be reopened unless the transfer area is clean of contaminants. Stormwater discharges from secondary containment systems should be avoided during periods of precipitation. A logbook shall be maintained on-site noting the date, time and personnel supervising each discharge.

c. Discharge Monitoring of Bulk Storage Secondary Containment Systems and Tank Hydrotest Waters - This paragraph only applies to those bulk storage containment system outlets which are not identified in the SPDES permit as an outfall with explicit effluent limitations. Prior to each discharge of contained waters, such waters must be screened for contamination*. The method of screening shall be developed by the permittee as part of the overall Best Management Practices Plan. Examples of screening methods include inspection for any visible evidence of contamination for non-fuel petroleum secondary containment and volatile gas meters for petroleum fuel or volatile materials secondary containment. If the screening indicates contamination, the permittee must collect and analyze a representative sample** of the contained liquid and contact the regional water engineer (or the regional water engineer's authorized representative) to determine if the contained liquid may be discharged.

d. Discharge Monitoring of Transfer Area Secondary Containment Systems - This paragraph only applies to those transfer area containment system outlets which are separate from bulk storage containment system outlets and are not identified in the SPDES permit as an outfall with explicit effluent limitations. The first discharge* following any spill or leak must be sampled for flow, pH, the substance(s) transferred in that area and any other pollutants believed to be present**.

e. Discharge Reporting - Results of analytical monitoring required above must be submitted to the Department by appending them to the corresponding discharge monitoring report (DMR). Failure to perform the required discharge monitoring and reporting shall constitute a violation of the terms of the SPDES permit.

f. Prohibited Discharges - The following discharges are prohibited unless specifically authorized elsewhere in this SPDES permit or unless proper notification is provided to the department and the department determines such discharge may proceed without modification to this permit: spills or leaks, tank bottoms, maintenance wastewaters, wash waters where detergents or other chemicals have been used, contained fire fighting runoff, fire training water contaminated by contact with pollutants or containing foam or fire retardant additives, and, unnecessary discharges of water or wastewater into secondary containment systems. An example of a necessary discharge could be the addition of steam to prevent bulk storage containment area sump pumps from freezing during cold weather. In all cases, any discharges which contain visible sheen, foam, or odor, or may cause or contribute to a violation of water quality are prohibited.

* Discharge includes stormwater discharges and snow and ice removal. If applicable, a representative sample of snow and/or ice should be collected and allowed to melt prior to assessment.

** If the stored substance is a petroleum fuel (i.e. fuel oil, gasoline, kerosene, etc.), then the discharge should be sampled for oil & grease, benzene, ethylbenzene, naphthalene, toluene and total xylenes. If the stored substance(s) are listed in Tables 6-8 of application form NY-2C sampling is required. If the substance(s) are listed in NY-2C Tables 9-10 sampling for appropriate indicator parameters may be required, e.g., substituting BOD5 for methanol, substituting toxicity testing for demeton. The volume of discharge may be calculated by measuring the depth of water within the containment area times the wetted area converted to gallons or by other suitable methods. Form NY-2C is available on the NYSDEC web site. Contact the facility inspector for further guidance.

APPLICATION FOR PERMIT TRANSFER
(In Accordance with Uniform Procedures, Part 621.13)

Please read ALL instructions on back before completing this application. Please TYPE or PRINT clearly in Ink.

PART 1—TRANSFeree (NEW OWNER/OPERATOR/LESSEE) COMPLETES:

1. LIST PERMIT NUMBER(S) AND THEIR EFFECTIVE AND EXPIRATION DATES. EXP. N/A
 a) 3-5522-0015/8 eff. 9/9/96 exp. N/A c) 3-5522-00105/000 NY0004472 eff. 10/1/92
 b) 3-5522-00105/00009 552201-1886 eff. 3/23/99 d) 3-5522-00105/00019 eff. 2/11/00 exp. 2/3/04

2. NAME OF TRANSFeree
 Entergy Nuclear Indian Point 3, LLC If other than an individual, provide Taxpayer ID Number 72-146645

STREET
 Bleakly Avenue and Broadway

TELEPHONE NUMBER
 (914) 736-8000

CITY
 Buchanan

STATE
 NY

ZIP CODE
 10511

3. TRANSFeree IS AN: Owner Operator Lessee

4. NAME OF FACILITY/PROJECT
 Indian Point 3 Nuclear Power Station

STREET
 Bleakly Avenue and Broadway

CITY

STATE
 NY

ZIP CODE
 10511

COUNTY
 Westchester

TOWN
 Buchanan

5. HAS WORK BEGUN ON THE PROJECT?

Yes No If no, proposed starting date: N/A Approximate completion date: _____
 If there will be any modifications to the current operation, the transferee must attach a statement specifying the details.

6. CERTIFICATION: This certifies that the transferee, with the ~~being the~~ owner/operator/lessee of the named facility, has a copy of the permit, understands and will comply with all conditions in the referenced permit. Facility operations/project scope/discharges/emissions will remain the same. Further, I hereby affirm that under penalty of perjury that information provided on this form and all attachments submitted herewith is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Signature and Title [Signature] Senior Vice President Date 7/20/00
 Chief Operating Officer

PART 2—TRANSFEROR (FORMER OWNER/OPERATOR/LESSEE) COMPLETES:

1. NAME OF TRANSFEROR
 New York Power Authority If other than an individual, provide Taxpayer ID Number 131-85-0882

STREET
 123 Main Street

TELEPHONE NUMBER
 (914) 661-6405

CITY
 White Plains

STATE
 NY

ZIP CODE
 10601

2. NAME OF FACILITY/PROJECT, IF DIFFERENT FROM NAME IN PART 1:

3. CERTIFICATION: This certifies that the facility referenced in Part 1 of this form will be/was transferred to the party identified as the new transferee

(owner/operator/lessee) on or about (date) September 7, 2000.

Signature and Title [Signature] Director, Environmental Division Date July 19, 2000

PART 3—PERMIT TRANSFER VALIDATION SECTION—DEPARTMENT OF ENVIRONMENTAL CONSERVATION COMPLETES:

Transfer of permit approved. Transferee subject to conditions of permit, without exception.

Transfer of permit approved, with the following modifications: See attached revised permit page(s) SPDES Pages: 6 of 19, 12A of 19, 12B of 19, 12C of 19

1. This permit transfer becomes effective upon the sale of the facility to Entergy Nuclear Indian Point 3, LLC. Entergy shall submit confirmation of the purchase within 48 hours of the closing to the undersigned Deputy Regional Permit Administrator.

Distribution:

See Attached Cover Letter

New application required. Please complete the enclosed permit application and return it to the undersigned Regional Permit Administrator.

Signature [Signature]
 William E. Steidle Regional Permit Administrator

Date November 20, 2000