Niagara Mohawk

April 20, 2001
NMP2L 2018

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: ***Transmittal of 2000 Annual Environmental Operating Report***

Gentlemen:

In accordance with Appendix B of the Operating License (Environmental Protection Plan) for Nine Mile Point Nuclear Station (NMPNS) Unit 2, enclosed is the Annual Environmental Operating Report for the period January 1, 2000 through December 31, 2000.

In the event you have any questions concerning the report, please contact Kent Stoffle, Supervisor Environmental Protection, at (315) 349-1364.

Very truly yours,

Michael F. Peckham
Plant Manager - NMP2

MFP/KES/mlg
Enclosure

xc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. M. K. Gamberoni, Director, Project Directorate I-1, NRR
Mr. G. K. Hunegs, Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
Records Management

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NIAGARA MOHAWK POWER CORPORATION

ANNUAL ENVIRONMENTAL OPERATING REPORT

January 1, 2000 - December 31, 2000

for

NINE MILE POINT NUCLEAR STATION UNIT 2

Facility Operating License NPF-69
Docket Number 50-410

ANNUAL ENVIRONMENTAL OPERATING REPORT

Section 5.4.1 of the Environmental Protection Plan (EPP), as contained in Appendix B of the Operating License for the Nine Mile Point Nuclear Station Unit 2, requires that an Annual Environmental Operating Report be submitted to the Commission prior to May 1 of each year. The following addresses the requirements found in Section 5.4.1 of the EPP for the submittal of the Annual Environmental Operating Report:

1. *Provide summaries and analyses of the results of the environmental protection activities required by Section 4.2 (if any) of the EPP, including a comparison with related preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports; and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, a detailed analysis of the data and a proposed course of mitigating action shall be provided.*

   Section 4.2 of the EPP denotes three areas of environmental monitoring:

   - Section 4.2.1 (Aquatic Monitoring) has no specific monitoring requirements although it is noted that the Commission will rely on the decisions made by the State of New York under the authority of the Clean Water Act for any requirements. Aquatic monitoring is specified in the station's State Pollutant Discharge Elimination System Permit (SPDES Permit) which is a site permit applicable to Nine Mile Point Nuclear Station Unit 1 and Unit 2. The SPDES Permit requires a limited Aquatic Monitoring Program (referred to in the permit as a Biological Monitoring Program) which, at the present time, is only applicable to Unit 1. Therefore, no Aquatic Monitoring Program is presently required for Unit 2.

   - Section 4.2.2 (Terrestrial Monitoring) does not contain any monitoring requirements.

   - Section 4.2.3 (Noise Monitoring) does not contain any monitoring requirements.

2. *Provide a list of EPP noncompliances and corrective actions.*

   A review of the EPP requirements and plant records showed that there were no conditions of noncompliance with the EPP requirements during 2000. Therefore, no corrective actions were required.

3. *Provide a list of all changes in station design or operation, tests, and experiments made in accordance with EPP Section 3.1 which involved a potentially significant unreviewed environmental question (non-radiological).*

A review of plant records showed that there were two changes in station design/operation that involved a potentially significant unreviewed environmental question (non-radiological). Environmental evaluations were performed, which concluded that the changes did not create an unreviewed environmental question.

Both changes involved the venting of sulfur dioxide (SO_2) and chlorine (CL_2) gases to the environment. These gases are produced during the transfer and storage of sodium bisulfite and sodium hypochlorite solutions. The gases are constituents of the sodium bisulfite and sodium hypochlorite solutions used to treat the facility's service water systems.

The first modification was to improve the building ventilation to remove low-level fumes that originated in the chemical storage tank areas within the acid storage building. The second modification was to extend the tank ventilation to the exterior of the acid storage building.

Substances stored in the acid storage building included sodium bisulfite, sodium bromide and sodium hypochlorite. Sodium bisulfite and sodium hypochlorite are considered hazardous materials. The chemical storage tanks are registered with the New York State Department of Environmental Conservation (NYS DEC) pursuant to the hazardous substance bulk storage regulations (6 New York Codes, Rules and Regulations (NYCRR) Part 596).

Nine Mile Point Nuclear Station (NMPNS) is a non-Title V facility as defined by NYS DEC regulation 6 NYCRR Part 201. As such, activities that may result in airborne emissions that are exempt per 6 NYCRR Part 201-3.2 or are trivial per 6 NYCRR Part 201-3.3 are not subject to permits or registration certificates.

Releases from chemical bulk storage tanks within the acid storage building are potentially regulated under 6 NYCRR Part 201 due to the presence of sulfur dioxide in the sodium bisulfite tank and chlorine in the sodium hypochlorite tank. However, both tanks qualify for exempt and/or trivial status as follows:

a. Sodium bisulfite tank - This tank has a capacity of approximately 25,500 gallons. Since the material being stored contains less than one percent sulfur dioxide by weight, releases from this tank qualify for trivial status per 6 NYCRR Part 201-3.3(c)(94).

b. Sodium hypochlorite tank – This tank has a capacity of approximately 1,700 gallons. Since the material being stored contains less than one percent chlorine by weight, releases from this tank qualify for trivial status per 6 NYCRR Part 201-3.3(c)(94). In addition, the storage tank qualifies for exempt status per 6 NYCRR Part 201-3.2(c)(25) since it has a storage capacity of less than 10,000 gallons and is not subject to 6 NYCRR Part 229 or Part 233.

The discharge of sulfur dioxide and chlorine from these tanks is considered to be environmentally insignificant. Sulfur dioxide and chlorine releases from products containing less than one percent by weight of these two constituents have been evaluated under 6 NYCRR Part 201. Such releases have been determined to be trivial and/or exempt from obtaining a permit or registration certificate.

In conclusion, the release of sulfur dioxide and chlorine during the transfer and storage of sodium bisulfite and sodium hypochlorite at NMPNS poses no significant environmental threat. The discharge of sulfur dioxide and chlorine gases to the environment conforms to all criteria and standards of the New York State Department of Environmental Conservation and the Federal Environmental Protection Agency. These changes do not involve an unreviewed environmental question or constitute a decrease in the effectiveness to meet the objectives specified in Section 1.0 of the EPP.

4. *List all non-routine reports that were submitted during 2000 in accordance with Section 5.4.2 of the EPP.*

During 2000, there were no non-routine reports submitted to the Commission in accordance with Section 5.4.2 of the EPP.