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October 8, 2001
PY-CEI/OEPA-0362L

Ohio Environmental Protection Agency
Northeast District Office
Attention: Ms. Marie Underwood
2110 E. Aurora Rd.
Twinsburg, OH 44087-1969

Ladies and Gentlemen,

On 10/2/01, the Perry Nuclear Power Plant (PNPP) reported a Noncompliance in accordance with Ohio Environmental Protection Agency (OEPA) Permit No. 31B00016*ED. This report was made due to exceeding the effluent limit for Clam-Trol while performing the annual zebra mussel treatment. The initial report was made to Mr. Chris Holmes at 13:35 by calling 1-800-282-9378. A call was then made to Ms. Marie Underwood per the direction of Mr. Holmes. This letter serves as confirmation of the telephone report to Mr. Holmes and Ms. Underwood.

Per Part III, Section 12.B, the following information was reported on 10/2/01:

1. **The times at which the discharge occurred, and was discovered:** The discharge occurred at 1350 on 10/1/01 and returned within limit at 1525 on 10/1/01. It was discovered on 10/1/01 at 1350. The discharge went above the limit again at 2258 on 10/1/01 and returned within limit at 1431 on 10/2/01.
2. **The approximate amount and the characteristics of the discharge:** The maximum value detected at outfall 004 was 0.35 mg/l. All sample times, locations and plant conditions related to the discharge are on the attached data sheet. The limit for final effluent entering Lake Erie is 0.04 mg/l. The actual discharge to the lake is over 2,350 feet downstream of the sample point for outfall 004. It is believed that the Clam-Trol would be consumed prior to entering the lake due to the excess detox agent added to the outfall. A sample taken on the lake at the discharge structure had no detectable Clam-Trol.
3. **The stream affected by the discharge:** Lake Erie.

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4. **The circumstances which created the discharge:** The initial three samples greater than the limit are believed to be due to insufficient mixing of detox agent with discharge flow prior to the sample point. Detox agent had been fed at a rate greater than required to detoxify the Clam-Trol. When sample results indicated the effluent limit was exceeded, the detoxification was increased to the maximum feed rate. Due to improper calculation of sample results, the first exceedance was believed to be at higher levels than actual levels and for a longer duration. The resulting excessive feed rate led to the exhaustion of detox agent prior to complete Clam-Trol reduction in the Circulating Water System. This led to the second violation of the effluent limit. Detox agent was sent from another facility to detoxify the system and restore the effluent within limits. For the treatment, 250 gallons of Clam-Trol were injected. This would require 15,390 pounds of detox agent. Over 18,000 pounds of detox agent were added during this evolution.
5. **The names and telephone numbers of the persons who have knowledge of these circumstances:** Environmental Specialist, Leo Harte (440)-280-5514.
6. **What remedial steps are being taken:** Site specific procedures have documented these problems. These documents will require a thorough investigation and remedial steps to correct deficiencies before performing the evolution in the future.
7. **The names and telephone numbers of the persons responsible for such remedial steps:** Leo Harte (440)-280-5514.

Per Part III, Section 12.C, the following information is provided:

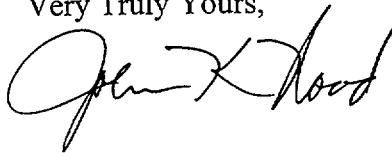
1. **The limitation which has been exceeded:** The limit for final effluent entering Lake Erie is 0.04 mg/l.
2. **The extent of the exceedance:** The maximum value detected at outfall 004 was 0.35 mg/l. All sample times, locations and plant conditions related to the discharge are on the attached data sheet, and are corrected for any previous calculation errors. The limit for final effluent entering Lake Erie is 0.04 mg/l. The actual discharge to the lake is over 2,350 feet downstream of the sample point for outfall 004. It is believed that the Clam-Trol was consumed prior to entering the lake due to the excess detox agent added to the outfall. A sample taken on the lake at the discharge structure had no detectable Clam-Trol.
3. **The cause of the exceedance:** The initial three samples greater than the limit are believed to be due to insufficient mixing of detox agent with discharge flow prior to the sample point. Detox agent had been fed at a rate greater than required to detoxify the Clam-Trol. When sample results indicated the effluent limit was exceeded, the detoxification was increase to the maximum feed rate. Due to improper calculation of sample results, the first exceedance was believed to be at higher levels than actual levels and for a longer duration. The resulting excessive

feed rate led to the exhaustion of detox agent prior to complete Clam-Trol reduction in the Circulating Water System. This led to the second exceedance of the effluent limit. Detox agent was sent from another facility to detoxify the system and restore the effluent within limits. For the treatment, 250 gallons of Clam-Trol were injected. This would require 15,390 pounds of detox agent. Over 18,000 pounds of detox agent were added during this evolution.

4. **The period of the exceedances including exact dates and times:** The discharge occurred at 1350 on 10/1/01 and returned within limit at 1525 on 10/1/01. The discharge went above the limit again at 2258 on 10/1/01 and returned within limit at 1431 on 10/2/01.
5. **If uncorrected, the anticipated time the exceedance is expected to continue:**
The exceedance is corrected.
6. **Steps taken to reduce, eliminate, and/or prevent recurrence of the exceedance:** Site specific procedures have documented these problems. These documents will require a thorough investigation and remedial steps to correct deficiencies before performing the evolution in the future.

If you have any questions or require additional information, please contact Mr. Leo Harte at (440)-280-5514.

Very Truly Yours,



Enclosures

cc: NRC Region III
NRC Resident Inspector
NRC Project Manager
NRC Document Control Desk (Docket No. 50-440)

Date	Time	Result	Location *	Comments
10/1/01	1018	0.00		
	1140			Commenced biocide injection
	1259	0.00		
	1350	0.05		Increased detox feed rate
	1453	0.10		
	1454	0.10		Reduced injection rate
	1525	0.00		
	1600	0.00		Reduced injection rate
	1600	0.00	dip	
	1710	0.00		
	1725	0.00	dip	
	1740			Secured injection
	1800	0.00	lake	
	1802	0.00		
	1830	0.00	dip	
	1831	0.00		
	1902	0.00		
	1935	0.00		
	1936	0.00		
	2005	0.00		
	2035	0.00		
	2107	0.00		
	2206	0.00		Ran out of detox agent
	2258	0.24		
10/2/01	0001	0.20		
	0115	0.03		
	0210	0.35		Maximum value
	0610	0.20		
	0857	0.23		
	1117	0.23		
	1230			Resumed detoxification
	1431	0.00		
	1524	0.00		
10/3/01	1200	0.00		
				* All samples taken at outfall
				004 normal sample pump unless
				indicated otherwise.