



2600 Bull Street
Columbia, SC 29201-1708

COMMISSIONER:
Douglas E. Bryant

June 24, 1997

BOARD:
John H. Burriss
Chairman

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William M. Hull, Jr., MD
Vice Chairman

Ms. Susan Reese
SCE&G/V.C. Summer Nuclear Station
Post Office Box 88
Jenkinsville, S.C. 29065

Roger Leaks, Jr.
Secretary

Richard E. Jabbour, DDS

RE: Notice of Violation 97-39-30856-322
SCE&G/V.C. Summer Nuclear Station
NPDES Permit SC0030856
Fairfield County

Cyndi C. Mosteller

Brian K. Smith

Rodney L. Grandy

Dear Ms. Reese:

A review of the discharge monitoring reports (DMRs) submitted to the Department for the April 1997 monitoring period has found SCE&G to be in violation of the reporting requirements of NPDES Permit SC0030856. The DMR for discharge number 013 1 for the November 1996 through April 1997 monitoring period has not been received by the Department.

Please be aware that failure to comply with the conditions of the NPDES Permit is a violation of the Pollution Control Act, S.C. Code Ann. Section 48-1-10 et seq. (1987) and makes SCE&G subject to further enforcement action, which may include civil penalties as set forth in Section 48-1-330 of the Act.

You are requested to submit the above referenced DMR within five (5) days of receipt of this notice. Your response should include an explanation for the violation cited above, and measures that have been or will be taken to ensure compliance with permit conditions. This response will not relieve SCE&G of responsibility for the violation cited.

If you have any questions concerning this notice, you may call me at (803) 734-5297. I will be glad to assist you.

Sincerely,

Sandra L. Hursey
Environmental Quality Manager
Water Pollution Enforcement Section
Bureau of Water

cc: NOV File
Central Midlands EQC District Office



South Carolina Electric & Gas Company
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-4344

Gary J. Taylor
Vice President
Nuclear Operations

July 2, 1997
RC-97-0136

Ms. Sandra L. Hursey
Environmental Quality Manager
Water Pollution Enforcement Section
Bureau of Water
South Carolina Department of Health and
Environmental Control
2600 Bull Street
Columbia, SC 29201

Dear Ms. Hursey:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
NPDES PERMIT NO. SC0030856
FAIRFIELD COUNTY
NOTICE OF VIOLATION 97-39-30856-322

This letter is in response to the Notice of Violation received by South Carolina Electric & Gas Company (SCE&G) on June 26, 1997. The violation was issued by your office for an alleged failure on the part of Virgil C. Summer Nuclear Station (VCSNS) to include a discharge monitoring report (DMR) for discharge number 013 1 in the April 1997 report. This violation further stated that the report should have been included in the April DMRs since the monitoring period ran from November 1996 through April 1997.

SCE&G does not consider the VCSNS to be in non-compliance with the conditions of the NPDES Permit or the approved Sampling Plan submitted to DHEC following issuance of NPDES Permit SC0030856 in September of 1993. A condition of the permit was for SCE&G to submit a Sampling Plan which would address all of the monitoring requirements. This plan, as submitted on October 29, 1993 (reference attached), established a sampling frequency for March and September (not April and October) of each year for compliance with the NPDES Permit frequency of twice per year. Even though the plan has been revised a number of times since this original submittal, the sampling dates have remained consistent and SCE&G has always submitted the results in the month of sampling. Please note the March 1997 DMR (attached) for the latest submittal.

Since this facility has been in compliance with the NPDES Permit requirements to sample Outfall 013 twice per year and the sampling times were approved by DHEC, it is requested that this Notice of Violation be withdrawn.



Ms. Sandra H. Hursey, SCDHEC
EPA 970003
RC-97-0136
Page 2 of 2

Your consideration of this request to withdraw the violation is appreciated. Should you have any questions concerning this information or on previous correspondence between DHEC and SCE&G regarding the sampling program at VCSNS, please call Mr. Charles McKinney at 345-4723.

Very truly yours,


Gary J. Taylor

cjm
Attachments

c: W. F. Bacon
R. J. White
J. A. Collins
S. E. Summer
S. B. Reese
W. C. Botts
RTS (EPA 970003)
File (809.02-17)
DMS (RC-97-0136)

**NL&OE
COMPLETION FORM**

RTS# EPA 970003 ISSUE MANAGER: C. J. McKinney

TITLE/SUBJECT: DHEC Notice of Violation on Failure to Submit Outfall 013 DMR

ACTIONS COMPLETED: July 14, 1997

POSITION/STATUS*: In a letter dated June 24, 1997, DHEC issued a Notice of Violation (NOV) for failure to report the semi-annual sampling results for Outfall 013 in the April 1997 Discharge Monitoring Report (DMR). During the initial assessment of this NOV by Licensing it appeared to have been issued in error since the sampling results had been submitted with the March 1997 DMRs. A Licensing response requesting withdrawal of the NOV was subsequently prepared and submitted on July 2, 1997.

Subsequent discussions with DHEC revealed that their initial letter had not been clear. The NOV was issued because the DMR did not have the correct sampling period (i.e., November 1, 1996 to April 30, 1997) identified in the monitoring period block of the DMR form. This error was corrected with the submittal of a new DMR form on July 14, 1997.

This issue can be closed since there is no further action required on the part of SCE&G.

C. J. McKinney 8/8/97 [Signature] 8/11/97
Issue Manager Date Approval Authority Date

Route: RTS: de 8-12-97 CC: _____
IM: CSM
File: 809.02-17

* This electronic form has been verified to contain the information on the master control copy. CSM Initials 8/8/97 Date



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Columbia, SC 29201-1708

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Brian K. Smith

Rodney L. Grandy

July 8, 1997

RECEIVED

JUL 14 1997

& OE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary J. Taylor, Vice President
Nuclear Operations
SCE&G/V.C. Summer Nuclear Station
Post Office Box 88
Jenkinsville, S.C. 29065

RE: **Notice of Violation** 97-39-30856-322
SCE&G/V.C. Summer Nuclear Station
NPDES Permit SC0030856
Fairfield County

Dear Mr. Taylor:

This letter is in response to your letter dated July 2, 1997.

The sampling plan referenced in your letter defines sample dates and assures compliance with monitoring requirements of the permit. However, in order to properly report monitoring results to SC DHEC, the monitoring period must be properly specified on the DMR. Months (or days) when samples are taken do not determine monitoring periods. All monitoring periods begin on the first day of a calendar month and are determined by the effective date of the permit, or permit modification, for that outfall. For instance, the effective date of the DMR for discharge number 013 1 (as noted in the upper right corner of the DMR) is November 1. Since these parameters are to be monitored twice per year, the correct monitoring periods are November 1 through April 30 and May 1 through October 31.

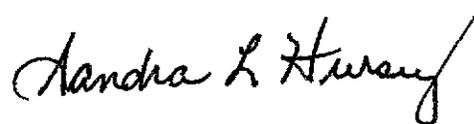
Monitoring requirements of the permit require that parameters for discharge number 013 1 be sampled at least once during each monitoring period. SCE&G has chosen to sample in March and September. Sample results are then to be reported to SC DHEC on DMRs dated in conformance with the monitoring periods stated above.

Since DMRs are legal documents it is unlawful for SC DHEC to alter information, even for data entry purposes. Therefore, **until a corrected DMR for discharge number is 013 1 is received, Summer Nuclear Station will remain in violation of the reporting requirements of its NPDES Permit and subject to further enforcement action.**

Gary J. Taylor
July 8, 1997
Page Two

If you have addition questions concerning reporting requirements, please call Mrs. Angela Murray at (803) 734-5162. She will be glad to assist you.

Sincerely,



Sandra L. Hursey
Environmental Quality Manager
Water Pollution Enforcement Section
Bureau of Water

cc: Susan Reese
Bill Botts
Central Midlands EQC District Office



South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station.
P.O. Box 88
Jenkinsville, SC 29065
(803) 345-5209
(803) 634-2011

April R. Rice
Manager, Nuclear Licensing &
Operating Experience

July 14, 1997
RC-97-0140

Ms. Sandra Hursey
Environmental Quality Manager
Water Quality Assessments and
Enforcement Division
Bureau of Water
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, SC 29201

Dear Ms. Hursey:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
MONTHLY DISCHARGE MONITORING REPORTS
NPDES PERMIT NO. SC0030856 (EPA 970003))

Enclosed is the Monthly Discharge Monitoring Report (DMR) for Outfall 013 for the period of November 1, 1996 to April 30, 1997. This report is submitted per your request in a letter dated July 8, 1997.

Should you have any further questions, please call Ms. Susan B. Reese at 345-4591.

Very truly yours,

April R. Rice

SBR
Enclosure

c: W. F. Bacon
J. W. Preston
G. A. Montondo
DMS (RC-97-0140)
RTS (EPA 970003)
File (809.02-17)

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

NAME SCE&G / SUMMER NUCLEAR STATION
ADDRESS P.O. BOX 88
Jenkinsville, SC 29065

SC0030856
PERMIT NUMBER

013 1
DISCHARGE NUMBER

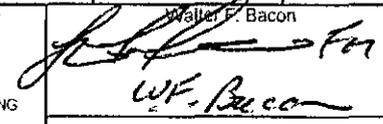
MAJOR

FACILITY SCE&G / SUMMER NUCLEAR STATION
LOCATION HIGHWAY 215

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY
96	11	01		97	04	30
(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

39 CM FINAL LIMITS
DMR VALID: 11/01/1993 - 09/30/1997
NOTE: Read Instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (38-45)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE (54-55)	MAXIMUM (56-57)	UNITS (58-59)	MINIMUM (38-39)	AVERAGE (40-41)	MAXIMUM (42-43)	UNITS (44-45)			
00400 LAB ID: 20001 pH Standard Units MLOC=1	SAMPLE MEASUREMENT	*****	*****	*****	7.6	*****	7.6	SU		02/YR	GR
	PERMIT REQUIREMENT	*****	*****	*****	REPORT MINIMUM	*****	REPORT MAXIMUM	SU		02/YR	GR
00530 LAB ID: 20001 Total Suspended Solids (TSS) MLOC=1	SAMPLE MEASUREMENT	*****	*****	*****	*****	2.0	2.0	MG/L		02/YR	GR
	PERMIT REQUIREMENT	*****	*****	*****	*****	REPORT MO AVG	REPORT DAILY MX	MG/L		02/YR	GR
50050 LAB ID: 20001 Flow in Conduit MLOC=1	SAMPLE MEASUREMENT	0.000500	0.000500	MGD	*****	*****	*****	*****		02/YR	ES
	PERMIT REQUIREMENT	REPORT MO AVG	REPORT DAILY MX	MGD	*****	*****	*****	*****		02/YR	ES
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Gary J. Taylor Vice President, Nuclear Operations	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319 (Penalties under these statutes may include fines up to \$10,000 and / or maximum imprisonment of between 6 months and 5 years.)	Walter P. Bacon		TELEPHONE		DATE		
				803	345-4156	97	7	15
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NOTE: SAMPLES SHALL BE TAKEN AT FOLLOWING LOCATION - SEE PARA. A. 3.

Outfall 013 is sampled in March and September.