FENOC
First Energy Nuclear Operating Company

Perry Nuclear Power Plant
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Perry, Ohio 44081

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Manager – Radwaste, Environmental, Chemistry

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March 24, 2003
PY-CEI/OEPA-0396L

Ohio Environmental Protection Agency
Division of Surface Water
P. O. Box 1049
Columbus, OH 43216-1049

Ladies and Gentlemen,

As, discussed with Mr. Erm Gomes of the Ohio Environmental Protection Agency, the Perry Nuclear Power Plant (PNPP) will be performing an acid flush of the dechlorination piping to correct clogging problems in inaccessible piping. The product to be used is inhibited hydrochloric acid at concentrations of less than 10%. PNPP will use no more than 100 gallons of this solution (10% hydrochloric acid and city water) at flow rates no greater than 1gallon per minute. A pH meter will be use to continuously monitor the effluent and will be recorded every half-hour during the flush. If the effluent limit is approached, the flush will be secured to prevent an effluent limit violation. The flush is tentatively scheduled to be performed between March 27 and March 31, 2003

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

Very Truly Yours,

James R Hayes

Attachments

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

IE23

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Perry Nuclear Power Plant

Memorandum
RECS-03-00040T

Date: 3/21/03; 08:15 AM

Mr. Erm Gomes of the Ohio EPA returned Mr. Leo Harte's telephone call of 3/20/03. This call was made to discuss using an acid to flush the dechlorination lines, which have continued to clog since converting from sodium sulfite to sodium bisulfite. Mr. Harte's original call requested what information the OEPA would require and requested if a rapid response was possible due to the current inability to chlorinate without dechlorination. In Mr. Hartes absence, Mr. Jamie Balstad accepted Mr. Erm Gomes return call at 08:15 Am on 3/21/03. Mr. Balstad reviewed with Mr. Gomes the information provided by Mr. Harte. Mr. Gomes was informed that the flush was tentatively scheduled for March 27th and March 31st, 2003. The chemical being used was inhibited hydrochloric acid at a concentration of less than or equal to 10%, and that PNPP would not use more than 100 gallons of the concentration at flow rates not greater than 1 gallon per minute. The duration of the flush would be 100 to 200 minutes based on the achievable flow rate. A pH meter would be used at the effluent sample point to monitor effluent and recorded every half hour during the flush. In addition, Mr. Gomes was informed that there was no expected change to the outfall pH based on the normal system flow of 40,000 gallons per minute. Mr. Gomes requested that this information be faxed for his review and that PNPP could expect his answer on 3/24/03.

Cc: J. Emley
M. Doty
R. Hayes
RECS Correspondence file

Erm Gomes Ohio EPA 330-963-1196

Half inch pipe approx 200 ft long, underground and inaccessable

Using inhibited hydrochloric acid (to minimize damage to metal pipe)

Concentration no greater than 10%

Flow rate no greater than 1 gpm

Maximum amount to be used is 100 gallons

Duration of 100 to 200 minutes depending on achievable flow rate

Continuous readout of pH on outfall sample point, recorded every half hour

Perform between March 27 to 31

Service water flow of 40,000 gallons per minute

Part I, A. - INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until 24 months after the effective date , the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from outfall 3IB00016004. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 004 - Interim

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00011 - Water Temperature - F	-	-	-	-	-	-	-	1/Day	Grab	All
00400 - pH - S.U.	9.0	6.5	-	-	-	-	-	2/Week	Grab	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
34044 - Oxidants, Total Residual - mg/l	0.05	-	-	-	-	-	-	1/Day	Grab	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Continuous	All
50064 - Chlorine, Free Available - mg/l	0.5	-	-	0.2	-	-	-	1/Day	Grab	All
78739 - Chlorination/Bromination Duration - Minutes	120	-	-	-	-	-	-	1/Day	Total	All

Notes for Station Number 3IB00016004:

* The Free Available Chlorine (FAC) and Total Residual Oxidants (TRO) limits are the maximum allowed at the outfall at any time. Analyses are to be performed by amperometric titration, Orion Residual Chlorine Electrode, or other approved methods during chlorination and /or bromination. The daily grab samples for FAC and TRO shall represent the maximum concentration discharged during chlorination and/or bromination.

** Measure TRO, FAC and Cl/Br duration on days when using treatment.

*** Grab sample for TRO and FAC will be taken during treatment event.

****Free Available Chlorine or Total Residual Oxidants may not be discharged from any single generating unit for more than 2 hours per day.

(1) Total Residual Oxidants reflects the use of bromine compounds. Bromine can be used separately or in combination with chlorine. These limits are effective when bromine is used. Discharge limitations for TRO may be met using a dehalogenation agent, if necessary. Dehalogenation shall be achieved by using stoichiometric calculations to determine the amount of dehalogenating agent necessary to completely eliminate the residual.