

January 25, 2005 L-05-005

Department of Environmental Protection Bureau of Water Quality Management Attention: DMR Clerk 400 Waterfront Drive Pittsburgh, PA 15222

Beaver Valley Power Station (Amended) Discharge Monitoring Report (NPDES) Permit No. PA0025615

To Whom It May Concern:

Pursuant to FirstEnergy Nuclear Operating Company's (FENOC's) NPDES Permit No. PA0025615, FENOC submits monthly Discharge Monitoring Reports (DMRs) for each of its outfalls covered under the Permit. In September, new lab technicians observed no flow from outfalls 301 and 401, and determined that at each outfall there was no discharge. Because the new technicians were not familiar with the nature of the systems and alternate sampling procedures if no discharge was detected, September DMRs were submitted indicating that no discharges had occurred. While reviewing DMRs and sampling procedures as part of FENOC's compliance management system (human performance peer-checking, we recently discovered that because discharges had been recorded at outfalls 301 and 401 during each month of the previous four years, a discharge had likely occurred at these outfalls during the month of September. Based on this information, an amended DMR is attached.

Consistent with Pennsylvania Department of Environmental Protection's (DEP's) "Policy to Encourage Voluntary Compliance By Means of Environmental Compliance Audits and Implementation of Compliance Management Systems" and the Environmental Protection Agency's (EPA's) "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," FENOC has satisfied the requisite conditions for a full waiver of gravity-based penalties. As noted above, the potential inaccuracy in the DMR was discovered during a self assessment of FENOC's sampling procedures and practices, and was voluntarily and promptly disclosed to DEP. Internally, this condition was documented and investigated in the FENOC Problem Identification and Resolution Program under Condition Report number CR-04-09707. Corrective actions, which include reviews and modification of procedures and work orders, and technician training, are also being tracked under the Condition Report, and DMR's were accurately submitted in both October and November. In addition, as noted above, an amended September DMR is attached.

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January 25, 2005 L-05-005 Page 2 of 2

Please direct all future correspondence and/or inquiries regarding this matter to Michael Banko at 724-682-4117. Thank you for your cooperation.

Sincerely,

James H. Lash

Director, Site Operations

slf

Attachment

CC: Document Control Desk US NRG(NOTE: No new US NRC commitments are contained in this letter.)

US Environmental Protection Agency

Central File - Keyword(s): DMR - Amended

NATIONAL POLLUTANT DISCHARGE FLIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved. OMB No. 2040-0004

ADDRESS PA ROUTE 168

SHIPPINGPORT

PA 15077-0004

PA0025615 PERMIT NUMBER

301 A DISCHARGE NUMBER MAJOR , : AMENDED DMR: (SUBR 05) F - FINAL

UNIT 2 AUX BOILER BLOWDOWN INTERNAL DUTFAL

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HATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

OMB No. 2040-0004 MAJOR

Form Approved.

ADDRESS PA ROUTE 168 SHIPPINGPORT

PA 15077-0004

PA0025615 401 A PERMIT NUMBER DISCHARGE NUMBER

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COMMENTS AND: EXPLANATION: OF ANY VIOLATIONS (Reference: all attachments: here)

SAMPLES SHALL BE TAKEN AT CHEMICAL FEED AREA DRAINS PRIOR TO MIXING WITH ANY OTHER WATER.