

From: "Timothy Rice" <tbrace@gw.dec.state.ny.us>
To: <JDN@nrc.gov>
Date: 3/13/06 5:01PM
Subject: Re: IP2 SIT mention of PCBs at Unit 1

Jim,
Understood. If you want to send it for our review in the morning that would be fine.

On the issue of the SPDES permit, the relevant wording is:

"Additional Requirements:

1. There shall be no discharge of PCB's from this facility."

However, the issue is somewhat complicated. If you could satisfy their interest by saying that their SPDES permit currently in effect precludes Entergy from discharging any PCB's, that would be appreciated. If you need to you can certainly provide the quote above.

The current SPDES permit is tied up in litigation. Until that litigation is over, the conditions of the previous permit remain in effect. The wording above is from that permit. Due to this status, if there are any specific questions on PCB's related to the SPDES Permit that can not be answered by providing them with the general statement above, or the above excerpt from the permit, it would probably be better for the Department to answer those questions directly rather than their being addressed by the NRC.

Thanks for understanding,
Tim

>>> "James Noggle" <JDN@nrc.gov> 3/13/06 4:24:45 PM >>>

Thanks, Tim. Any help from Larry would be appreciated. Since talking with you earlier today, Randy Blough let Fred Dacimo and Don Mayer know that we plan to talk about PCB contamination at Unit 1 in our report and they were not excited about this. Randy thinks it is important to reinforce the concern that early remediation could make the site contamination worse, so we are planning to embellish the section on Unit 1 spent fuel pool description to include mention of PCB contamination. If this was already written I would send it to you. It will be ready by tomorrow morning, though. Also, John White wanted a copy of the SPDES permit that lists PCBs, so we can respond to questions. I would appreciate it if you could e-mail this to me. Thanks for your help.

Regards,

Jim

>>> "Timothy Rice" <tbrace@gw.dec.state.ny.us> 03/13/06 4:12 PM >>>

Jim,

I had an engineer, who put previously worked on the PCB issue, and Larry Rosenmann look at the wording. The specific discussion of the PCB presence is generally okay, though you should probably replace the wording about pulling the PCB contamination "from the french drain", to "from the area drained (or possibly affected by) by the french drain".

Larry is out of the office today and looked at this via e-mail from home. If you can wait until tomorrow morning, he has some good suggestions regarding some of the discussion of groundwater flow that would make it clearer and less open to misinterpretation.

Let me know if you want his input and he will make it his first priority in the morning.

Thanks,
Tim

A/121

>>> "James Noggle" <JDN@nrc.gov> 3/13/06 8:15:39 AM >>>

Dear Tim,

As you know, the NRC intends on mentioning the known PCB contamination associated with Unit 1, but since it is outside of NRC jurisdiction, we would like to characterize this appropriately for the State of New York. This will serve 2 purposes: it will keep pressure on Entergy to sample PCBs in the Unit 1 wells, and it justifies waiting until the hydrology study is complete before pumping Unit 2 wells and potentially extending PCB contamination across the site.

The current 2 areas mentioning Unit 1 in our inspection Draft are attached. I may want to add that the Unit 1 water storage pool indicates 700 ppb PCB and the North Curtain Drain influent indicates 1 ppb, is processed through 2 charcoal columns and meets the NYS MDA of <.65 ppb prior to releasing to the discharge canal. What can I say in this area?

Regards,

Jim

James Noggle
3/13/06

CC: "Alan Fuchs" <aafuchs@gw.dec.state.ny.us>, "Barbara Youngberg" <bayoungb@gw.dec.state.ny.us>, "Paul Kolakowski" <pjkolako@gw.dec.state.ny.us>