

RAOG 06-0039

NP-07

August 13, 2006

Mr. Rick Zuzik, Environmental Scientist  
Division of Surface Water  
Ohio Environmental Protection Agency  
Northwest District Office  
347 North Dunbridge Road  
Bowling Green, Ohio 43402

Subject: Discharge of Total Residual Oxidants Through National Pollutant Discharge Elimination System Outfall 001

Dear Mr. Zuzik:

The September 6, 2006, daily discharge sample of Total Residual Oxidants (TRO) from the Davis-Besse Nuclear Power Station (DBNPS) National Pollutant Discharge Elimination System (NPDES) Permit 2IB00011\*ID Outfall 001 (discharge to Lake Erie) measured 0.28 mg/l. The DBNPS NPDES Permit 2IB00011\*ID TRO daily limit at Outfall 001 is 0.05 mg/l. This letter provides the five-day written confirmation, as required by the DBNPS NPDES Permit, of a permit nonconformance.

On Wednesday, September 6, 2006, at 1000 hours, the daily TRO analysis at Outfall 001 measured 0.28 mg/l. All chlorination/bromination was shut down at 1027 hours, and additional TRO sampling continued until 1041 hours when the NPDES Outfall 001 discharge concentration decreased to less than the NPDES Outfall limit of 0.05 mg/l.

The evaluation of the reason(s) for this permit nonconformance, which is currently underway, has identified several potential causes:

A simultaneous lack of chlorine demand due to the plant being manually tripped/shutdown at approximately 0230 hours and automatic startup of the chlorination/bromination feed pump to the Circulation Water System from 0730 hours until 0930 hours contributed to the chlorine level increase.

The requirement to shut down Intake and Circulating Water chlorination after a plant trip/shutdown was not implemented.

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This event has been captured in the DBNPS corrective action process, the evaluation is in progress and appropriate corrective actions will be taken to reduce, eliminate, and/or prevent occurrence of this exceedance.

This condition was discussed with you in a telephone conversation on September 7, 2006, at 0810 hours by a member of my staff, Mr. Stephen M. Chimo. As discussed, this written information is being provided to you within 5 working days of the September 6, 2006, NPDES permit Outfall 001 TRO nonconformance.

Should you have any questions or require additional information, please contact Mr. Stephen M. Chimo at (419) 321-7149.

Sincerely yours,

*C. A. Hawley / C. A. Hawley*

*for*  
Barry S. Allen  
Director - Site Operations

Davis-Besse Nuclear Power Station

SMC/JCS

Attachment

cc: NRC Document Control Desk  
DB-1 NRC Senior Resident Inspector  
US EPA, Region V

COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Director - Performance Improvement (419-321-7181) at Davis-Besse of any questions regarding any associated regulatory commitments.

COMMITMENTS

DUE DATE

None

NA