



April 5, 2007

Ms. Kate Crowley
Water Quality Regional Manager
Bureau of Water Quality Management
Pennsylvania Department of Environmental Protection
Two Public Square
Wilkes-Barre, PA 18711-0790

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR NPDES PERMIT AMENDMENT
NPDES PERMIT NO. PA-0047325
PLE 0024357

Dear Ms. Crowley:

This letter is a request for an administrative amendment to NPDES Permit No. PA-0047325 to clarify PPL Susquehanna's monitoring and reporting obligations for outfalls 070, 075 and 080 which are substantially identical stormwater outfalls. Specifically, PPL Susquehanna is requesting that it be allowed to file one DMR for all three stormwater outfalls.

With regard to these substantially identical stormwater outfalls, the permit states:

When a facility has two or more outfalls that may reasonably be believed to discharge substantially identical effluents, based on a consideration of features and activities within the area drained by the outfall, the permittee may sample one such outfall and report that the quantitative data also applies to the substantially identical outfalls.

In compliance with the permit, PPL sampled Outfall 075 and reported in its DMR cover letter that the quantitative data from 075 also applied to Outfalls 070 and 080. PPL believes this was sufficient as the permit does not state that individual DMR forms for the stormwater outfalls that were not sampled (070 and 080) must be filled out and separately submitted.

But in PaDEP's March 9, 2007 Notice of Violation (NOV) letter, PaDEP asserted that PPL Susquehanna was in violation of the permit by failing to submit separate DMR forms for stormwater outfalls 080 and 070 respectively. PPL Susquehanna does not believe that the separate DMR forms were required to be submitted and believes that PaDEP's expectation in this regard creates unnecessary confusion.

Therefore, to alleviate this confusion PPL Susquehanna is requesting PaDEP to amend the permit as follows:

- In Part C, section 14, subsection F (Stormwater Sampling and Reporting): explicitly state that stormwater Outfalls 070, 075 and 080 are all considered substantially identical, therefore the annual monitoring results from any one of the three stormwater outfalls will be reported on a single annual stormwater DMR form for all three stormwater outfalls;

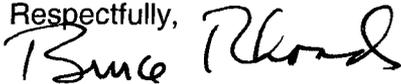
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- Eliminate the individual Annual DMR forms for stormwater Outfalls 070, 075 and 080;
- Create a new, single annual stormwater DMR form that serves as the combined reporting form for all three stormwater outfalls (070, 075, and 080).

We have discussed this approach with Brian Busher and believe that it is the best way to eliminate the existing ambiguity. If you wish to discuss the proposed amendment, please contact Curtis Saxton at (570) 542-1879.

Respectfully,



Bruce E. Rhoads
Manager – Plant Chemistry

Copy to:

Ms. N. Green, EPA Region III

Mr. James F. Holmes, PA Dept of Environmental Protection

NRC, ATTN: Document Control Desk

NRC, Region I

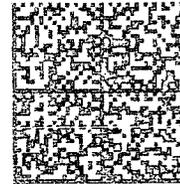
Mr. A. J. Blamey, NRC, Sr. Resident Inspector

Mr. R. V. Guzman, NRC, Project Manager



PPL Susquehanna, LLC

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Berwick, PA 18603



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