

**Britt T. McKinney**  
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**PPL Susquehanna, LLC**  
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APR 05 2007

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station OP1-17  
Washington DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION**  
**RESPONSE TO MARCH 9, 2007 NPDES VIOLATION**      **Docket Nos. 50-387**  
**PLA-6180**      **and 50-388**

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*References: 1) PLE 0024351, B. E. Rhoads (PPL) to PA Department of Environmental Protection, "Response to March 9, 2007 NOV Letter NPDES Permit No. PA-0047325" dated March 20, 2007.*

The purpose of this letter is to transmit PPL Susquehanna, LLC's (PPL) response to a March 9, 2007 National Pollutant Discharge Elimination System (NPDES) Notice of Violation letter received from the Pennsylvania Department of Environmental Protection (PA DEP). This transmittal fulfills the reporting requirements contained in Section 3.2 of PPL's Environmental Protection Plan.

As part of PPL's NPDES permit, effective September 1, 2005, Storm Water discharge monitoring is required annually. As is allowed by the permit, PPL performed the requisite monitoring on one outfall representative of the three storm water outfalls covered by the permit. The results were reported on the Discharge Monitoring Report (DMR) for that outfall. Recently however, PPL received a Notice of Violation (NOV) letter from the PA DEP for failure to provide DMRs for the other two outfalls. This event is attributable to an administrative misunderstanding that has been resolved by reproducing and submitting data from the sampled outfall onto two additional DMR forms per the PA DEP's direction. PPL's response to the NOV is attached for your information.

Should you have any questions, please contact Mr. Eric J. Miller, at (570) 542-3321.

B. T. McKinney

Attachment

cc: NRC Region I  
Mr. A. J. Blamey, NRC Sr. Resident Inspector  
Mr. R. V. Guzman, NRC Project Manager  
Mr. R. R. Janati DEP/BRP

C001



March 20, 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  
RESPONSE TO MARCH 9, 2007 NOV LETTER  
NPDES PERMIT NO. PA-0047325  
PLE 0024351

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Dear Ms. Crowley:

This letter is in response to PaDEP's March 9, 2007 letter regarding a Notice of Violation (NOV) asserting that PPL failed to submit separate annual DMR forms for stormwater outfalls 080 and 070. PPL does not believe that separate DMR forms were required to be submitted and believes, in fact, that such a procedure would create unnecessary confusion.

The permit covers three substantially identical outfalls: 070, 075 and 080. 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." Therefore, PPL sampled Outfall 075 and reported in its cover letter that the quantitative data also applies to Outfall 070 and 080. PPL believes this was sufficient as the permit does not state that DMR forms for the discharges that were not sampled must be filled out and separately submitted.

A better procedure may be to amend the permit to explicitly state that Outfall 075 is the representative sampling point for Outfall 070, and 080 and that separate DMRs for 070 and 080 are not required. We will file a request for such an amendment shortly. In the meantime, we will file separate DMRs for these outfalls, attached, with a notation that the DMRs for Outfalls 070 and 080 reflect the results of sampling at Outfall 075.

We hope the foregoing is satisfactory to the Department. Curtis Saxton at (570) 542-1879 will be in touch with you shortly to discuss this approach.

Respectfully,

Bruce E. Rhoads  
Manager - Plant Chemistry

Copy to:

Ms. N. Green, EPA Region III  
Mr. James F. Holmes, PA Dept of Environmental Protection



NAME PFL SUSQUEHANNA LLC

ADDRESS 769 SALEM BLVD  
BERWICK

PA 18603-0467

PA0047325  
PERMIT NUMBER

070 Y  
DISCHARGE NUMBER

MAJOR

(SUBR 02)

F - FINAL

070/S-2 SEDIMENTATION POND(SW)

Salem Township, Luzerne County

FACILITY PFL SUSQUEHANNA LLC

LOCATION BERWICK

PA 18603-0467

ATTN: BRITT T MCKINNEY, SR. VP CND

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY

\*\*\* NO DISCHARGE 1  \*\*\*

NOTE: Read Instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS
00400 1 0 0 EFFLUENT GROSS VALUE SOLIDS, TOTAL SUSPENDED	SAMPLE MEASUREMENT	*****	*****	*****	*****	8.05	*****	12	*	1/365	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	REPORT MD AVG	*****			ANNUAL	GRAB
00530 1 0 0 EFFLUENT GROSS VALUE OIL & GREASE	SAMPLE MEASUREMENT	*****	*****	*****	*****	5.6	*****	17	*	1/365	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	REPORT MD AVG	*****			ANNUAL	GRAB
00556 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	45	*****	17	*	1/365	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	REPORT MD AVG	*****			ANNUAL	GRAB
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

B.T. McKinney, SR VP  
Chief Nuclear Officer

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

*Britt T. McKinney, Sr.*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

570-542-1879

DATE

07 03 20

AREA CODE NUMBER

YEAR MO DAY

TYPED OR PRINTED

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

Outfalls 070 + 080 reflect the results of sampling at outfall 075 per Section C, 1, 14, F, 4 of the Permit.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME PPL SUSQUEHANNA LLC

ADDRESS 749 SALEM BLVD

BERWICK

PA 18603-0467

FACILITY Salem Township, Luzerne County

LOCATION PPL SUSQUEHANNA LLC

ATTN: BRITT T MCKINNEY, SR. VP CND

PA 18603-0467

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

PAG047325

PERMIT NUMBER

080 Y

DISCHARGE NUMBER

MAJOR

(SU8R 02)

F - FINAL

080 / C-1 POND (SW)

Form Approved  
OMB No. 2040-0004

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY

\*\*\* NO DISCHARGE 1 1 \*\*\*

NOTE: Read Instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
00400 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	****	*****	8.05	*****	12	*	1/365	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	REPORT MD AVG	*****	SU		ANNUAL	GRAB
00530 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	****	*****	5.6	*****	19	*	1/365	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	REPORT MD AVG	*****	MG/L		ANNUAL	GRAB
00556 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	****	*****	25	*****	19	*	1/365	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	REPORT MD AVG	*****	MG/L		ANNUAL	GRAB
	SAMPLE MEASUREMENT										
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	PERMIT REQUIREMENT										

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Chief Nuclear Officer

TYPED OR PRINTED

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

*Britt T. McKinney, Sr.*

TELEPHONE

570-542-1879

DATE

07 03 20

AREA CODE

NUMBER

YEAR MO DAY

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

NOTE: Outfalls 070 & 080 reflect the results of sampling at Outfall 075 per section C, 1, 14, F, 4 of the Permit.