Nuclear Operating Company
South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

June 4, 2008
ABR-AE-08000040

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike

Rockville, MD 20852-2738

South Texas Project Units 3 & 4
Docket No. 52-012 and 52-~~102~~ 013
Cultural or Historical Artifact Discovery During Construction

References: 1) Letter, G.T. Gibson to W.F. Burton, "Environmental Report Acceptance Review: Outstanding Issues," dated November 8, 2007 (ABR-AE-07000010)
2) Letter G.T. Gibson to Document Control Desk, "Changes to NRC Commitments," dated February 12, 2008 (ABR-AE-08000021)

Reference 1 describes a commitment by STP Nuclear Operating Company (STPNOC) to develop a procedure for discovery of cultural or historical artifacts during construction. Reference 2 requests an extension of the due date for submitting the procedure.

This letter transmits a copy of Procedure No. 0PGP03-ZO-0025 entitled "Site Environmental Compliance." Addendum 5 to this procedure (Unanticipated Discovery of Cultural Resources) details the actions to be taken by STPNOC staff and management including the relevant agency contacts to be notified. This procedure is effective as of June 2, 2008.

Please feel free to call me at (361) 972-4626 or Russell W. Kiesling at (361) 972-4716 should you have any questions regarding this submittal.

There are no commitments in this letter.

Gregory T. Gibson
Manager, Regulatory Affairs

sad

Attachment: 0PGP03-ZO-0025

D079
NRO

STI: 32321373

cc: w/o attachment except*

(paper copy)

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Site Environmental Compliance			
Non-Quality	Non Safety-Related	Usage: **Available**	Effective Date: 06/02/08

J. King	S. Dannhardt	R. Hotstream	Chemistry
PREPARER	TECHNICAL	USER	COGNIZANT DEPT.

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1.0 Purpose and Scope

1.1 This procedure provides guidelines necessary for site compliance with applicable non-radiological environmental laws, regulations, procedures, and commitments at the South Texas Project Electric Generating Station (STPEGS).

1.2 This procedure defines those deviations, deficiencies, discrepancies, and items requiring remedial action for correction that constitute an environmental violation.

1.3 This procedure describes the minimum actions which may be taken for notification or prevention of an environmental violation, or subsequent corrective actions if appropriate.

1.4 Each section of this procedure may be performed independently.

2.0 Definitions

2.1 BYPASS: The intentional diversion of waste streams from any portion of a treatment facility (e.g., overflows or discharging a system to other than its designated outfall).

2.2 ENVIRONMENTAL PROGRAM COORDINATOR: The individual(s) in the Environmental Division responsible for the environmental program at the STPEGS.

2.3 ENVIRONMENTAL PROTECTION AGENCY (EPA): The federal agency responsible for assuring the protection of the environment by abating and controlling pollution on a systematic basis.

2.4 ENVIRONMENTAL PROTECTION PLAN (NONRADIOLOGICAL) (EPP): Plan established to provide for protection of nonradiological environmental values during operation of the South Texas Project Electric Generating Station (STPEGS). This plan is described in Appendix B to the Unit 1 Operating License NPF-76 and Unit 2 Operating License NPF-80, Environmental Protection Plan (Nonradiological).

2.5 ENVIRONMENTAL VIOLATION: Any deviation, deficiency or discrepancy with established site environmental procedures OR any applicable federal, state, or local laws or regulations.

2.6 HAZARDOUS MATERIAL: Any substance so designated by the EPA under 40CFR116 pursuant to Section 311 of the Clean Water Act; also, any substance used as product defined as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) OR, for the purposes of transportation, which contains any constituent or combination thereof as listed in 49CFR172.

2.7 HAZARDOUS WASTE: Any waste material defined as hazardous by the CERCLA OR which contains any constituent or combination thereof as listed in 49CFR172 with the exception of radioactive waste; ALSO, any waste material exhibiting any of the characteristics identified in Subpart C of 40CFR261, OR any waste material listed in Subpart D of 40CFR261, OR any waste material which is ignitable, corrosive, reactive, or toxic to the extent that it may pose a threat to human health, safety, or the environment.

2.8 MIXED WASTE: Waste that contains both hazardous waste, as defined in this procedure, and source, special nuclear, or byproduct material subject to the Atomic Energy Act of 1954, as amended.

2.9 NON-ENGINEERED BERM: A berm which is NOT part of the normal plant design.

2.10 NONRADIOACTIVE WASTE MANAGEMENT COORDINATOR: The individual(s) in the Environmental Division that is responsible for coordinating nonradioactive waste disposal activities at the STPEGS.

2.11 PRODUCT: New, unused material (excluding articles as defined in 29CFR1910.1200) which could, if released, adversely affect personnel, equipment, the public, and/or the environment.

2.12 RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 (RCRA): The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, as amended which authorizes the EPA to regulate current and future waste management and disposal practices.

2.13 SITE: STPEGS as a whole.

2.14 SOLID WASTE: Any discarded or waste material as defined in 30TAC335.1 and 40CFR261.2.

2.15 STORAGE: To place or leave in a location for longer than seventy-two (72) hours.

2.16 TEXAS COMMISSION on ENVIRONMENTAL QUALITY (TCEQ): The state agency responsible for safeguarding the public and environment by setting and enforcing standards and emission limits for the abatement and control of air pollution and the administration of state water rights, water quality program including potable water, conduct of the state's coastal oil and hazardous spill prevention and control program, state programs involving underground water and water wells, and administration of the national flood insurance program. The TCEQ also oversees all aspects of industrial and municipal hazardous waste, radioactive waste, nonhazardous industrial solid waste, and sewage sludge disposal activities in Texas. (In 1993, the Texas Air Control Board merged with the Texas Water Commission to form the Texas Natural Resources Conservation Commission (TNRCC) which was renamed to the TCEQ in 2003. Portions of the Texas Department of Health (now known as the DSHS) were previously consolidated with the Texas Water Commission in 1992.)

2.17 TEXAS DEPARTMENT OF STATE HEALTH SERVICES (DSHS): The state agency responsible for regulating those systems, facilities, and conditions, which, if improperly handled, could have a detrimental impact upon human health. These regulated factors include, but are not limited to asbestos abatement, working conditions, and food quality.

2.18 TEXAS HISTORICAL COMMISSION (THC): The state agency responsible for identification of important historic sites and for historic preservation of Texas' architectural, archeological and cultural landmarks.

2.19 TEXAS POLLUTANT DISCHARGE ELIMINATION SYSTEM (TPDES): A program for issuing, enforcing and terminating permits and requirements of applicable sections of the Clean Water Act, as amended. TPDES permits specify the types and amounts of pollutants that may be discharged from wastewater treatment facilities.

2.20 UPSET: An exceptional incident (e.g., unusual amount of flow through a system or an unusual or abnormal input into a system) in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does NOT include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

2.21 WASTE: Any discarded or abandoned material, material used in a manner constituting disposal defined in 40CFR261, OR material intended for disposal (excluding articles as defined in 29CFR1910.1200).

3.0 Responsibilities

3.1 PLANT MANAGER: The plant manager is responsible for:

3.1.1 Implementing procedures, programs, and guidelines necessary to ensure Site environmental compliance;

3.1.2 Implementing procedures, programs, or guidelines necessary to ensure Site compliance with Administrative Policy No. STP-415.

3.2 DESIGN ENGINEERING DEPARTMENT: The Design Engineering Department is responsible for:

3.2.1 Monitoring and inspection of the Main Cooling Reservoir (MCR) and appurtenant structures and areas excluding electrical/mechanical facilities;

3.2.2 Generation of records documenting the aforementioned monitoring activities;

3.2.3 Providing technical assistance as necessary.

3.3 PERSONAL SAFETY GROUP: The Personal Safety Group is responsible for the implementation of all site environmental programs involving compliance with SARA Title III, Sections 311 and 312.

3.4 NUCLEAR LICENSING DEPARTMENT: The Nuclear Licensing Department is responsible for establishing and maintaining mechanisms necessary to ensure STPEGS's responsibilities relative to the reporting of information to the USNRC pursuant to 10CFR50 and any other such legally based requirements (including the annual submittal of the Annual Environmental Operating Report) and the preparation, internal review, and transmittal of written communications to the USNRC.

3.5 PLANT ENGINEERING DEPARTMENT: The Plant Engineering Department is responsible for:

3.5.1 Providing system engineers for the Oily Waste Treatment System, Nonradiological Chemical Waste Treatment System, Sanitary Waste Treatment Systems, Potable Water Systems and other systems with associated environmental regulations;

3.5.2 Notifying appropriate personnel and agencies of open burning activities associated with fire training exercises;

3.5.3 Providing technical assistance as necessary.

3.6 PLANT OPERATIONS DEPARTMENT: The Plant Operations Department is responsible for:

3.6.1 Compliant operations of the Oily Waste Treatment System, the Nonradiological Chemical Waste Treatment System, Water Wells Nos. 5, 6, and 7, the Auxiliary Boiler and temporary boiler (if applicable), diesel-driven equipment operated by the Plant Operations Department, the Reservoir Makeup Pumping Facility, the Spillway/Blowdown and other systems or equipment under Plant Operations control with associated environmental regulations as applicable;

3.6.2 Generation of applicable documentation including logs, records, and reports concerning operations of the aforementioned systems and equipment;

3.6.3 Providing spill response resources as necessary to conduct and support Plant Operations spill response activities;

3.6.4 Providing operational support and assistance as necessary.

3.7 FACILITIES MANAGEMENT DIVISION: The Facilities Management Division is responsible for:

3.7.1 Maintenance and repair of potable water pumping station 8, main potable water pumping station and distribution system outside the Protected Area;

3.7.2 Sanitary wastewater collection system outside the Protected Area;

3.7.3 Maintenance of the West and Training Sanitary Waste Treatment Systems.

3.7.4 Pest control, herbicide application, and municipal trash disposal;

3.7.5 Ensuring the site drainage system is free of obstructions and blockages;

3.7.6 Providing labor support for spill response and cleanup activities;

3.7.7 Construction of temporary berms;

3.7.8 Site dewatering activities;

3.7.9 Transportation of waste materials to the Hazardous Waste Storage Area;

3.7.10 General labor requirements;

3.7.11 Maintenance, repair and operation of facility/building HVAC and cooling water systems exclusive of those under the specific control of Plant Maintenance;

3.7.12 Pest, vermin and animal control.

3.8 MAINTENANCE DEPARTMENT: The Maintenance Department is responsible for:

3.8.1 Maintenance and repair of the potable water distribution system and the sanitary wastewater collection system inside the Protected Area;

3.8.2 Calibration of instrumentation required by site wastewater discharge permits;

3.8.3 Maintenance and repair of Water Wells Nos. 5, 6, & 7 and distribution system.

3.9 CHEMISTRY DIVISION: The Chemistry Division is responsible for:

3.9.1 Performing analyses required by permit or contract or arranging for offsite analysis as necessary or as otherwise coordinated with the Environmental Division. This includes, but may not be limited to, collection of wastewater outfall discharge samples; potable water samples for backshift, weekend and holiday support; and miscellaneous sampling activities necessary to support spill response, cleanup or remediation activities;

3.9.2 Implementing the station's Expendable Material Program;

3.9.3 Providing technical guidance for chemistry control of facility building cooling water systems.

3.9.4 Providing chemical analysis support and assistance as necessary.

3.10 HEALTH PHYSICS DIVISION: The Health Physics Division is responsible for:

3.10.1 Implementation of the station's Radiological Environmental Monitoring Program;

3.10.2 Implementation of site programs involving compliance with applicable laws, regulations and permits associated with mixed waste management;

3.10.3 Providing support resources as necessary for the Spill Response and Spill Cleanup Teams to address radiological spills or spills located in radiologically controlled areas;

3.10.4 Coordination of the station's Radiological Ground Water Protection Program.

3.11 ENVIRONMENTAL DIVISION: The Environmental Division is responsible for:

3.11.1 Performing analyses required by permit or contract or arranging for offsite analysis as necessary;

3.11.2 Providing technical assistance and consultation services as necessary concerning nonradiological site environmental matters;

3.11.3 Implementation of the Source Reduction and Waste Minimization Plan (nonradiological) for the STPEGS;

3.11.4 Implementation of site environmental programs involving compliance with applicable laws, regulations, and permits associated with non-radioactive solid and hazardous waste and sludge disposal, water quality and usage, air quality, potable water, and the EPP;

3.11.5 Implementation of site environmental programs involving ecological protection and control, landfill operations and compliance, compliance with Texas Parks and Wildlife permits and requirements, monitoring for compliance with U. S. Army Corps of Engineers' permits and requirements, spoil area monitoring and compliance;

3.11.6 Monitoring river flow rates as necessary for reservoir pumping;

3.11.7 Maintenance of the Hazardous Waste Storage Area;

3.11.8 Compliant operation of the Sanitary Waste Treatment Systems and Potable Water Systems;

3.11.9 Coordination of environmental compliance assessments;

3.11.10 Acquisition of local, state, and federal environmental permits and approvals.

3.12 The Houston Lighting and Power Co. Manager, Environmental Department, was responsible for preparation of the Units 1 and 2 Environmental Report, environmental-related portions of the Units 1 and 2 safety analysis report and acquisition of local, state and federal permits and approvals. These responsibilities were subsequently assumed by the Environmental Division for the STP Nuclear Operating Company.

3.13 SITE PERSONNEL: Site personnel are responsible for adhering to requirements set forth in this procedure or as further specified by Site Management.

4.0 Procedure

4.1 Wildlife Protection and Control

4.1.1 No site personnel other than the licensed Animal Controller available to the Site OR those individuals designated by the Facilities Management Division SHALL handle any traps or trapped animals.

4.1.2 No site personnel other than the contracted Pest Controller OR those individuals designated by the Facilities Management Division SHALL handle or remove any bait station.

4.1.3 No site personnel other than the licensed Animal Controller available to the Site OR those individuals designated by the Facilities Management Division SHALL touch, feed, capture, kill, remove, or take any action that may cause harm to any animal found on site.

4.1.4 Fish kills, dead or injured alligators, and unusual numbers of wildlife mortalities should be reported to the Environmental Division.

4.2 Plant Effluent Permit Requirements

NOTE

Limitations delineated in this section are necessary to ensure compliance with applicable TCEQ permit requirements. Site specific administrative controls MAY be more stringent.

4.2.1 Bypasses and upsets as defined in Section 2.0 of this procedure should be immediately reported to the Environmental Program Coordinator (EPC) or his/her alternate.

4.2.2 Upon the approval of the EPC or the Environmental Manager a bypass may be allowed if necessary for essential maintenance IF the bypass does NOT cause effluent limitations to be exceeded AND also meets the criteria in Step 4.2.3 below.

4.2.3 Bypasses are prohibited unless:

4.2.3.1 The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage, OR

4.2.3.2 There were no feasible alternatives, e.g., use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime AND a notice of an anticipated bypass has been filed with AND approved by the appropriate regulatory agency, OR

4.2.3.3 The bypass is authorized under a program of preventive or corrective maintenance as approved by the TCEQ.

4.2.4 Reasonable steps necessary SHALL be taken to minimize or prevent any bypass or upset.

NOTE

Effluent standards and limitations referred to in Step 4.2.5 are outlined in Addendum 2.

4.2.5 Exceedence of or noncompliance with applicable effluent standards and limitations or conditions as stated in TCEQ Permit No. 01908 SHALL constitute an environmental violation.

4.3 Plant Air Emissions Requirements

NOTE

Limitations delineated in this section are necessary to ensure compliance with applicable TCEQ permit requirements. Site specific administrative controls MAY be more stringent.

4.3.1 Permit exceedences, upsets and items of non-compliance as defined in this procedure should be promptly reported to the EPC or his/her alternate.

NOTE

Emission standards and limitations referred to in Step 4.3.2 are outlined in Addendum 3.

4.3.2 Exceedence of or noncompliance with applicable terms, conditions or emission standards and limitations as stated in TCEQ Permit No. 7410 or Federal Operating Permit O801 SHALL constitute an environmental non-compliance.

4.3.3 As a minimum, records of reportable and nonreportable exceedences or noncompliance's in accordance with Step 4.3.2 above SHALL contain the following information:

4.3.3.1 date and time of the occurrence;

4.3.3.2 the processes and equipment involved;

4.3.3.3 description and cause;

4.3.3.4 duration or anticipated duration;

4.3.3.5 steps taken to correct and minimize the emission;

4.3.3.6 steps taken to prevent recurrence.

4.3.4 Refrigerant management and use SHALL be in accordance with 0PGPG03-ZA-0511, Refrigerant Management Program.

4.3.5 The following activities relevant to lead-containing material require evaluation by Environmental personnel to determine environmental permitting requirements, if any:

4.3.5.1 Lead melting or reclamation activities;

4.3.5.2 Brazing, soldering or welding equipment that emit ≥ 0.6 tons per year (1,200 lbs/year) of lead;

4.3.5.3 Application of coatings that contain > 0.1% by weight of lead with spray equipment; or,

4.3.5.4 Activities where the emission of lead to the environment is anticipated.

4.3.6 Abrasive blasting of potable water storage tanks SHALL be conducted in accordance with and controlled by applicable requirements in Federal Operating Permit O801 and 30 T.A.C. §111.

4.3.7 Open burning activities including, but not limited to, fire training SHALL be conducted in accordance with applicable requirements in Federal Operating Permit O801 and 30 T.A.C. §111.

4.3.8 Blast Yard Operations

4.3.8.1 Blast Yard operations SHALL be consistent with the terms and conditions of TACB Permit Exemption No. X-4014.

4.3.8.2 Environmental shall be notified of any change to the Blast Yard facility or equipment impacting compliance with Permit Exemption No. X-4014.

4.3.8.3 The organization responsible for operation of the Blast Yard facility SHALL record monthly operating hours and amount/type of blast grit used. This information SHALL be transmitted to Environmental using Form 4, Blast Grit Usage Tracking, or in a format that allows completion of Form 4.

4.3.9 Surface Coat Facility Operations

4.3.9.1 Surface Coat Facility operations SHALL comply with applicable requirements in the June 1996 version of 30 T.A.C. §106.433 (previously Standard Exemption 75).

4.3.9.2 The organization responsible for operation of the Surface Coat Facility SHALL prepare a monthly report that contains the following. This data SHALL be transmitted to Environmental using Form 5, Surface Coat Facility Operations Tracking, or in a format that allows completion of Form 5:

a. Daily data of coatings and solvent use;

b. Actual hours of operation each day;

c. Volatile organic emissions from each operation in pounds per hour, pounds per day and pounds per week;

d. Examples of the method of data reduction including units, conversion factors, assumptions and bases for assumptions.

4.3.10 Degreasing Units

4.3.10.1 Degreasing unit operations (e.g. parts washers) SHALL comply with applicable requirements in the June 1996 version of 30 T.A.C. §106.454 (previously Standard Exemption 107).

4.3.10.2 The organization responsible for operation of degreasing units SHALL maintain a monthly tracking of solvent product used and total solvent makeup (gross usage minus waste disposal) for each unit operated. This data SHALL be transmitted to Environmental using Form 6, Degreaser Unit Operations Tracking, or in a format that allows completion of Form 6.

4.4 Plant Solid Waste Requirements

4.4.1 Waste management methods SHALL comply with TCEQ Registration No. 30651.

4.4.2 The generation of hazardous/nonhazardous wastes SHALL be minimized in accordance with the recommendations in Administrative Policy No. STP-415, the Source Reduction and Waste Minimization Plan for the STPEGS, and 0PGP03-ZI-0008, Control of Expendable Materials.

4.4.3 To ensure compliance with TCEQ Registration No. 30651, the following requirements concerning waste management methods SHALL apply:

4.4.3.1 Only inert construction debris and non-combustible waste as listed below may be disposed of in the on-site landfill.

NOTE

Concrete waste containing re-bar or other contaminants is not permitted in the onsite landfill. The station-preferred disposition of concrete and related material is to recycle when possible.

a. Concrete waste (e.g., blocks, test cylinders, mortar/grout, etc.)

b. Plastic

c. Rubber hose (no tires)

d. PVC pipe

e. Glass

f. Wire

4.4.3.2 Waste that cannot be land filled on-site SHALL be packaged in accordance with 0PGP03-ZH-0003, Packaging of Nonradioactive Waste Materials for Disposal, and shipped off-site for disposal or recycling in accordance with 0PCP10-ZH-0002, Packaging and Shipment of Nonradioactive Waste Materials.

4.4.4 The type of material that may be stored in stock piles north of Building 20 are as follows:

4.4.4.1 Clean road construction material

4.4.4.2 Clean backfill material

4.4.4.3 Asphalt/backfill material destined for recycle or reuse

4.4.4.4 Concrete/backfill material destined for recycle or reuse

4.4.5 The type of material that may be placed on the area west of Building 20 is as follows:

4.4.5.1 Clean fill material

4.4.5.2 Material removed from ditch clearing activities

4.4.6 The types of items that can be disposed of in trash containers or dumpsters from office, cafeteria, or food service operations are as follows:

4.4.6.1 Paper

4.4.6.2 Cardboard

4.4.6.3 Wood (treated/untreated)

4.4.6.4 Food wastes

4.4.6.5 Plastic

4.4.6.6 Polystyrene

NOTE

Outside the Protected Area, scrap metal shall be stored in the scrap metal yard west of Warehouse E. Scrap metal components that cannot fit (e.g. due to size or irregular shape) in the scrap metal dumpsters provided must be cut to fit or special arrangements must be made through the Nuclear Purchasing and Materials Management Department to have the material hauled directly.

4.4.7 The type of items that can be placed in scrap metal dumpsters are items made of metal with the exceptions of:

4.4.7.1 Compressed gas cylinders

4.4.7.2 Aerosol cans

4.4.7.3 Any equipment that still contains oil or any other hazardous/nonhazardous material (e.g., transformers, oil filters, etc.).

4.5 Plant Drainage Requirements

4.5.1 Plant drainage and dewatering activities SHALL comply with the requirements delineated in the applicable TCEQ discharge permit and the Storm Water Pollution Prevention Plan (SWPPP) for the STPEGS.

4.5.2 Only the following plant water systems may be diverted if necessary into the storm drain/plant drainage system:

4.5.2.1 Well water

4.5.2.2 Fresh water

4.5.2.3 Potable water

4.5.2.4 Service water

4.5.2.5 Fire water

4.5.3 No process water (e.g., demineralized, flush, blowdown, chemical cleaning, or hydro) SHALL be diverted to the storm drain/plant drainage system without prior approval by the EPC or the Environmental Manager.

4.5.4 At least once per calendar year, a compliance evaluation will be conducted in accordance with the SWPPP.

4.5.5 Monitoring will be conducted quarterly and recorded on Form 7, Storm Water Sampling.

4.5.6 A monthly inspection of pollutant sources will be conducted and recorded on Form 8, Storm Water Pollutant Source Monthly Checklist.

4.5.7 A quarterly inspection of pollutant sources and best management practices contained in the SWPPP will be conducted and recorded on Form 9, Storm Water Periodic Inspection Checklist.

4.6 Hazardous and Nonhazardous Waste Accumulation and Disposal

NOTE

Total containment of temporary mobile tanks may be waived at the discretion of Environmental Personnel as long as reasonable measures (e.g., drip pans under hose connections, operational practices, etc.) to prevent leakage or spillage are implemented.

4.6.1 Accumulation of bulk quantities of waste (any quantity greater than one (1) gallon of chemicals, solvents, and hazardous material OR any quantity greater than thirty (30) gallons of oil or lubricants) which have a potential for direct discharge to the environment (i.e., any waste being accumulated without engineered containment) SHALL be within a bermed area.

4.6.2 Berms should be sized to contain the entire contents of the largest container plus 10 percent for precipitation. Accumulated precipitation in bermed areas must be removed in a timely manner as necessary to prevent overflow of the berm and not exceed the volume required to accommodate the largest container inside the berm. Covered berms need only be sized to contain the entire contents of the largest container.

4.6.3 Non-engineered bermed areas must have a sign specifying the organization responsible for that area.

4.6.4 Containers of waste SHALL be labeled with a permanent marker prior to filling with the type of waste contained. (paint, solvent, etc.) Containers SHALL be transferred to the Hazardous Waste Storage Area (HWSA) in accordance with 0PGP03-ZH-0003, Packaging of Nonradioactive Waste Materials for Disposal.

4.6.5 Containers accumulated within a bermed area SHALL be properly labeled identifying the contents of the container in accordance with 0PGP03-ZH-0003, Packaging of Nonradioactive Waste Materials for Disposal.

4.6.6 Containers which hold waste within a berm SHALL be closed at all times except when adding or removing waste.

4.6.7 When possible, product and waste stored within the same area SHALL be separated. (See Addendum 1 and Steps 4.7.7 through 4.7.9 for proper storage guidelines)

4.6.8 Disposal of expendable and hazardous or nonhazardous materials SHALL be in accordance with 0PGP03-ZH-0003, Packaging of Nonradioactive Waste Materials for Disposal.

4.6.9 Records SHALL be kept for all sludge removed from any wastewater treatment system. Records SHALL be maintained on a monthly basis using Form 3, Wastewater Treatment System Sludge Removal Log, and include the following:

4.6.9.1 Volume of waste and date(s) generated from treatment process.

4.6.9.2 Volume of waste disposed of on-site OR shipped off-site.

4.6.9.3 Date(s) of disposal.

4.6.9.4 Identity of transporter.

4.6.9.5 Location of disposal site.

4.6.9.6 Method of final disposal.

4.7 Oil/Chemical Product Storage

NOTE

In addition to the requirements listed below, procurement and storage of oil, chemicals, solvents, or hazardous material must comply with the requirements of:

- 0PGP03-ZF-0019, Control of Transient Fire Loads and Use of Combustible and Flammable Liquids and Gases,
- 0PGP03-ZI-0012, Hazardous Communication Program,
- 0PGP03-ZI-0015, Industrial Compressed Air and Gases,
- 0PGP03-ZG-0001, Control of Materials and Products by the User Group,
- 0PGP03-ZM-0004, Lubrication Program, and
- 0PGP03-ZI-0008, Control of Expendable Materials.

4.7.1 Storage of bulk quantities (any quantity greater than one (1) gallon of chemicals, solvents, and hazardous material OR any quantity greater than thirty (30) gallons of oil or lubricants) which have a potential for direct discharge to the environment (i.e., any material stored without engineered containment) SHALL be within a bermed area.

4.7.1.1 Berms should be sized to contain the entire contents of the largest container plus 10 percent for precipitation. Covered berms need only be sized to contain the entire contents of the largest container.

4.7.1.2 Alternative containment systems (e.g., skid pans or drip pans) may be used for product being stored temporarily.

NOTE

Loading or off-loading of product containers does NOT require a containment system although proper precautions should be taken to prevent any possible spills or discharge of product to the environment. Total containment of temporary mobile tanks may be waived at the discretion of Environmental Personnel.

4.7.1.3 Alternative containment systems (e.g., drip pans for hose connections) SHALL be employed for truck loading or off-loading activities.

4.7.2 Product containers SHALL be labeled to identify the contents contained (paint, solvent, etc.).

4.7.3 Accumulated precipitation in bermed areas must be removed in a timely manner as necessary to prevent overflow of the berm and not exceed the volume required to accommodate the largest container inside the berm.

4.7.3.1 Accumulated precipitation NOT routed to an appropriate treatment system shall be visually inspected for surface sheens or other indications of oil contamination prior to discharge.

4.7.3.2 Accumulated precipitation with indication of oil contamination SHALL be routed to an appropriate treatment system.

4.7.3.3 Accumulated precipitation removed from bulk oil storage facilities that is NOT routed to an appropriate treatment system SHALL be documented.

4.7.4 Containers within the berm SHALL be closed during storage except when it is necessary to remove material.

4.7.5 Non-engineered bermed areas must have a sign specifying the organization responsible for that area.

4.7.6 WHEN possible, THEN product and waste stored within the same area SHALL be separated. (See Addendum 1 in addition to Steps 4.7.7 through 4.7.9 for proper storage guidelines.)

4.7.7 Corrosive material SHALL NOT be stored next to flammable liquids, flammable solids, oxidizing materials, or organic peroxides.

4.7.8 Cyanides or cyanide mixtures SHALL NOT be stored with acids or corrosive liquids.

4.7.9 Poisonous gases SHALL NOT be stored with flammable liquids or flammable gases.

4.8 Spill Response, Cleanup, and Reporting

4.8.1 Spill response, cleanup, and reporting SHALL be done in accordance with 0PGP03-ZH-0006, Nonradioactive Spill Response, Cleanup and Reporting and the Integrated Spill Contingency Plan for STPEGS.

4.9 Monitoring and Reporting Requirements

4.9.1 STPEGS personnel SHALL conduct the activities describe below in accordance with applicable site procedures and policies.

4.9.1.1 Monitor ongoing site activities for compliance with environmental regulatory requirements:

a. Hazardous Waste Storage Area Weekly Inspection Checklist (Form 1).

b. Monthly Groundwater Usage Report (Form 2)

c. Wastewater Treatment System Sludge Removal Log (Form 3)

4.9.1.2 Conduct on-site sampling and analysis or arrange for offsite analysis of effluent streams, potable water system, groundwater wells, Main Cooling Reservoir, and waste streams associated with the solid waste management requirements.

NOTE

Step 4.9.1.3 is applicable only to activities covered by Unit 1 Operating License No. NPF-76 and Unit 2 Operating License No. NPF-80.

4.9.1.3 Submit copies to the USNRC of permit/license acquisitions and reports submitted in behalf of the STPEGS to other government agencies (federal, state, etc.)

4.9.1.4 Prepare and submit the Annual Environmental Operating Report (AEOR) as required by Section 5.4.1 of Appendix B to Unit 1 Operating License No. NPF-76 and Unit 2 Operating License No NPF-80, Environmental Protection Plan (Nonradiological).

4.10 Land Management

4.10.1 The following activities SHALL have a nonradiological environmental evaluation in accordance with 0PGP03-ZA-0017, Nonradiological Environmental Evaluations:

4.10.1.1 Any cleaning, clearing, or draining activities in the spillway channel other than mowing or actions that DO NOT disturb the root zone of the existing vegetation (SPR 941677).

4.10.1.2 Any activity that would disturb the Low Land Habitat.

4.10.1.3 Any clearing, grubbing, or grading other than routine mowing that would result in the disturbance of one or more acres of land.

4.10.2 Prior to disturbing the ground in an area on site outside the existing Unit 1 and Unit 2 facilities, a review SHALL be performed to determine if the area might contain archaeological items of cultural significance.

4.10.2.1 Review the Final Environmental Statement - Operating License (FES-OL), and supplements, Final Environmental Statement – Construction Phase (FES-CP), Environmental Report to the NRC and supplements, and/or Appendix B to Technical Specifications to obtain information pertaining to the archeological significance of the location where ground will be disturbed.

4.10.2.2 IF the document review indicates the NRC has previously evaluated the location where ground will be disturbed as not significant, THEN no further action is needed. OTHERWISE, contact the State Historic Preservation Officer for guidance on how to proceed prior to initiating ground disturbance.

4.10.3 IF during ground disturbance an unanticipated discovery of archaeological items of cultural significance is made, THEN refer to Addendum 5, Unanticipated Discovery of Cultural Resources, for further guidance.

4.11 Corrective Action Measures

4.11.1 Deviations, deficiencies, discrepancies, items requiring remedial action, or other environmental violations noted by the EPC or alternate SHALL be subject to corrective measures in accordance with 0PGP03-ZX-0002, Condition Reporting Process, or other applicable documentation.

4.12 Environmental Compliance Screening

4.12.1 Changes to procedures, programs, or the facility which may affect compliance with the Environmental Protection Program (EPP) or applicable operating permits SHALL be reviewed per 0PGP03-ZA-0017, Nonradiological Environmental Evaluations. Addendum 4, Environmental Compliance Screening Questions, may be used to determine if a proposed change requires a Nonradiological Environmental Evaluation.

5.0 References

5.1 Appendix B, Environmental Protection Plan (Nonradiological) to Unit 1 Operating License NPF-76 and Unit 2 Operating License NPF-80

5.2 0PCP10-ZH-0002, Packaging and Shipment of Nonradioactive Waste Materials

5.3 0PGP03-ZA-0017, Nonradiological Environmental Evaluations

5.4 0PGP03-ZA-0511, Refrigerant Management Program

5.5 0PGP03-ZH-0003, Packaging of Nonradioactive Waste Materials for Disposal

5.6 0PGP03-ZH-0006, Nonradioactive Spill Response, Cleanup, and Reporting

5.7 0PGP03-ZI-0008, Control of Expendable Materials

5.8 0PGP03-ZG-0001, Control of Materials and Products By User Groups

5.9 0PGP03-ZX-0002, Condition Reporting Process

5.10 0PGP03-ZI-0015, Industrial Compressed Air and Gases

5.11 0PGP03-ZG-0001, Control of Materials and Products by the User Group

5.12 40 CFR 261, 262, 268

5.13 49 CFR 171, 172

5.14 Texas Commission on Environmental Quality Permit No. 7410

5.15 Texas Commission on Environmental Quality Permit No. 01908

5.16 Federal Operating Permit O801

5.17 Facility Notice of Registration No. 30651

5.18 Integrated Spill Contingency Plan for STPEGS, October 2004

5.19 ST-YS-EY-6120, July 8, 1986

5.20 ST-HS-HS-5650, September 1, 1986

5.21 Administrative Policy No. STP-415

5.22 SPR-94-1677

5.23 Condition Report No. 97-8205

6.0 Support Documents

6.1 Form 1, Hazardous Waste Storage Area Weekly Inspection Checklist

6.2 Form 2, Monthly Groundwater Usage Report

6.3 Form 3, Wastewater Treatment System Sludge Removal Log

6.4 Form 4, Blast Grit Usage Tracking

6.5 Form 5, Surface Coat Facility Operations Tracking

6.6 Form 6, Degreaser Unit Operations Tracking

6.7 Form 7, Storm Water Sampling

6.8 Form 8, Storm Water Pollutant Source Monthly Checklist

6.9 Form 9, Storm Water Periodic Inspection Checklist

6.10 Addendum 1, Examples of Potentially Incompatible Waste/Materials

6.11 Addendum 2, Nonradiological Plant Effluent Standards and Limitations

6.12 Addendum 3, Auxiliary Boiler Emission Standards and Limitations

6.13 Addendum 4, Environmental Compliance Screening Questions

6.14 Addendum 5, Unanticipated Discovery of Cultural Resources

	Satisfactory	Comments & Corrective Actions
Housekeeping	Yes/No	
Drums Leaking	Yes/No	
Drums Properly Sealed	Yes/No	
Drum Exteriors & Tops Clean	Yes/No	
Drums Properly Labeled	Yes/No	
Adequate Aisle Space Between Drums	Yes/No	
Incompatible Wastes Separated	Yes/No	
Surplus of Material to be Poured Up	Yes/No	
Empty Containers Properly Disposed of	Yes/No	
Bulk Waste Containers Properly Labeled	Yes/No	
Bulk Waste Containers Leaking	Yes/No	
"Authorized Personnel" Signs Posted	Yes/No	
Security Fence & Gate Secure	Yes/No	
Safety Equipment Available (Fire Extinguisher, Eye Wash Station, etc.)	Yes/No	
Berm Integrity and Condition	Yes/No	
Accumulation Date of the Oldest Hazardous Waste Container:		

Inspection Performed by: _____ Date: _____

This form, when completed, SHALL be retained for the life of the plant

MONTHLY REPORT FOR
Month/Year: _____

WELL NO.	Ending			Beginning			Monthly Usage (Gal)	Remarks*
	Date Read	Time Read	Meter Reading (Gal)	Date Read	Time Read	Meter Reading (Gal)		
5								
6								
7								
8								
NTF-FW								

Total (Gal)_____

*Remarks should include the dates and meter readings associated with equipment (wells and meters) taken out of or returned to service.

Prepared by: _____ Date: _____

Reviewed by: _____ Date: _____

This form, when completed, SHALL be retained for the life of the plant.

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Site Environmental Compliance			
Form 3	Wastewater Treatment System Sludge Removal Log (Sample)		Page 1 of 1

MONTHLY REPORT FOR
Month/Year: _____

Date	Treatment System	Volume Removed	Disposal Date	Disposal Volume	Disposal Facility	Transporter	Disposal Method

Prepared by: _____ Date: _____

Reviewed by: _____ Date: _____

This form, when completed, SHALL be retained for the life of the plant.

Month/Year: _______________

Date	Operating Hours	Abrasive Type*	Amt. Used (tons)
Totals:			
*Abrasive type = Coal Slag, Silica Sand or Other (Specify)			
This facility is currently exempted under Permit Exemption No. X-4014			

Prepared by: ______________________________ Date: ____________________

This form, when complete, SHALL be retained for five years.

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	Site Environmental Compliance		
Form 5	Surface Coat Facility Operations Tracking (Sample)		Page 1 of 2

Day / Date		Hour 7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	VOC Emitted (lbs/day)	Usage (gal/day)	Total Operating Hours (hrs/day)
Sunday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															
Monday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															
Tuesday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															
Wednesday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															

This form, when complete, SHALL be retained for five years.

Day / Date		Hour												VOC Emitted (lbs/day)	Usage (gal/day)	Total Operating Hours (hrs/day)
		7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00			
Thursday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															
Friday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															
Saturday	Product No.															
	Quantity (gallons)															
	VOC (lb/gal)															
	EMISSIONS (lb/hr)															
	EMISSIONS (lb/5-hr)															
									VOC Emitted (lbs/wk) =							
									Operating Hours (hrs/wk) =							

Prepared by: _____ Date: _____

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Site Environmental Compliance			
Form 6	Degreaser Unit Operations Tracking (Sample)		Page 1 of 1

Degreaser Unit Location: _____

Month/Year	Solvent Type	Solvent Added (gal)	(-)	Solvent Drained (gal)	Net Usage (gal)
				Total:	gal

Prepared by: _____ Date: _____

This form, when complete, SHALL be retained for five years.

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Site Environmental Compliance			
Form 7	Storm Water Sampling (Sample)		Page 1 of 1

OUTFALL: _____

GENERAL

DATE OF OBSERVATION: _____

WEATHER CONDITIONS: _____

_____ TEMPERATURE: _____

RAINFALL STARTED AT: _____ RAINFALL ENDED AT: _____

DURATION OF STORM EVENT (MINUTES): _____ TOTAL RAINFALL (INCHES): _____

FIRST FLOW THROUGH OUTFALL OBSERVED AT: _____

VOL. DISCH. DURING EVENT (GAL.): _____

DATE OF PREVIOUS RAINFALL: _____ PREVIOUS RAINFALL AMOUNT (IN): _____

GRAB SAMPLES

SAMPLE DATE/TIME: _____ (MUST BE W/IN 30 MIN. OF FIRST OBSERVED FLOW THROUGH OUTFALL, NO MORE THAN AN HOUR)

VISUAL

COLOR: _____ FLOATING SOLIDS: _____

ODOR: _____ FOAM: _____

CLARITY: _____ OIL SHEEN: _____

OTHER OBVIOUS INDICATORS OF STORM WATER POLLUTION: _____

_____

ANALYTICAL

IRON COLLECTED: YES_____ NO_____ if no, why_____

TSS COLLECTED (if applicable): YES_____ NO_____ if no, why_____

SAMPLER SIGNATURE: _____

This form, when complete, SHALL be retained for five years.

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Site Environmental Compliance			
Form 8	Storm Water Pollutant Source Monthly Checklist (Sample)		Page 1 of 1

Month: _____ Performed by: _____

Potential Storm Water Pollutant Source	Remarks
Gasoline Storage Tank (fuel island)	
Diesel Storage Tank (fuel island)	
Diesel Storage Tank (NTF)	
Diesel Storage Tank (NSC)	
Diesel Storage Tank (EOF)	
Fueling Station	
Environmental Yard	
WSWTS/ Sodium Hypochlorite Tank	
TSWTS/Sodium Hypochlorite Tank	
NSC Potable Water Hypochlorite Tank	
Main Potable Water Hypochlorite Tank	
Car Wash	
Kerosene and Diesel Fuel Tanks Bld 20	
Admin Parking Lot	
Firing Range Parking Lot	
Drum Storage (Bld 20)	
Sandblast Area	
Equipment Laydown	
Material Stockpiles	
Landfill	(Inactive)
Land Farm	(Inactive)
Fertilizer/Herbicide	

Notes:
* Switchyard walk-downs are performed by Transmission and Distribution personnel.
* Warehouse Building 19 checked by Warehouse personnel.
* CW and EW chemical injection systems checked by Chemistry personnel.
* Remainder of Facilities on Plant Operation watch stations.

This form, when complete, SHALL be retained for five years.

Inspections are to be conducted on a quarterly basis. Refer to the Storm Water Pollution Prevention Plan (SWPPP) potential pollutant list for individual sources/locations.

Should revisions or additions to the SWPPP be required based on the findings of the inspection, a summary description of these proposed changes should be documented in a summary attached to the inspection checklist. The summary must include the time frame required to implement the proposed changes.

Area	Satisfactory?	Comments – if No, Other or NA
Good Housekeeping Measures		
Fueling Area(s)	Yes____ No____	_____
Chemical (Un)Loading Areas	Yes____ No____	_____
Liquid Storage Tanks	Yes____ No____	_____
Laydown Yard(s)	Yes____ No____	_____
Vehicle Maintenance Activities	Yes____ No____	_____
Material Storage Area(s)	Yes____ No____	_____
Bulk Storage Area(s)	Yes____ No____	_____
Pipeline(s)/Pumps for Fuel Oil/Chemicals	Yes____ No____	_____
Landfill Inspections		
Active Landfill Area:		
Stabilization/Erosion	Yes____ No____	_____
Storm Water Collection System	Yes____ No____	_____
Land Application Area:		
Stabilization/Erosion	Yes____ No____	_____
Storm Water Collection System	Yes____ No____	_____
Integrated Contingency Plan	Yes____ No____	_____
Erosion Control Measures	Yes____ No____	_____
Maintenance Program for Structural Controls	Yes____ No____	_____
Best Management Practices	Yes____ No____	_____
Employee Training	Yes____ No____	_____

Inspector: _____ Date: _____

This form, when complete, SHALL be retained for five years.

Many hazardous wastes, when mixed with other waste or materials at a hazardous waste facility, can produce effects which are harmful to human health and the environment, such as (1) heat or pressure, (2) fire or explosion, (3) violent reaction, (4) toxic dusts, mists, fumes, or gases, or (5) flammable fumes or gases.

Below are examples of potentially incompatible wastes, waste components, and materials, along with the harmful consequences which result from mixing materials in one group with materials in another group. It is possible for potentially incompatible wastes to be mixed in a way that precludes a reaction (e.g., adding acid to water rather than water to acid) or that neutralizes them (e.g., a strong acid mixed with a strong base), or that controls substances produced (e.g., by generating flammable gases in a closed tank equipped so that ignition cannot occur, and burning the gases in an incinerator).

In the lists below, the mixing of a Group A material with a Group B material may have the potential consequence as noted.

GROUP 1-A	GROUP 1-B
Acetylene sludge	Acid sludge
Alkaline caustic liquids	Acid and water
Alkaline cleaner	Battery acid
Alkaline corrosive liquids	Chemical cleaners
Alkaline corrosive battery fluid	Electrolyte, acid
Caustic wastewater	Etching acid liquid or solvent
Lime sludge and other corrosive alkalines	Pickling liquor and other corrosive acid
Lime wastewater	Spent acid
Lime and water	Spent mixed acid
Spent caustic	Spent sulfuric acid

Potential Consequences: Heat generation; Violent reaction

GROUP 2-A	GROUP 2-B
Aluminum	Any waste in Group 1-A or 1-B
Beryllium	
Calcium	
Lithium	
Magnesium	
Potassium	
Sodium	
Zinc powder	
Other reactive metals and metal hydrides	

Potential Consequences: Fire or explosion; Generation of flammable hydrogen gas.

GROUP 3-A	GROUP 3-B
Alcohols	Any concentrated waste in Groups 1-A or 1-B
Water	Calcium
	Lithium
	Metal hydrides
	Potassium
	SO_2Cl_2, $SOCl_2$, PCl_3, CH_3SiCl_3
	Other water-reactive waste

Potential Consequences: Fire, explosion, or heat generation; Generation of flammable or toxic gases.

GROUP 4-A	GROUP 4-B
Alcohols	Concentrated Group 1-A or 1-B waste
Aldehydes	Group 2-A wastes
Halogenated hydrocarbons	
Nitrated hydrocarbons	
Unsaturated hydrocarbons	
Other reactive organic compounds and solvents	

Potential Consequences: Fire, explosion, or violent reaction.

GROUP 5-A	GROUP 5-B
Spent cyanide and sulfide solutions	Group 1-B wastes

Potential Consequences: Generation of toxic hydrogen cyanide or hydrogen sulfide gas.

GROUP 6-A	GROUP 6-B
Chlorates	Acetic acid and other organic acids
Chlorine	Concentrated mineral acids
Chlorites	Group 2-A wastes
Chromic acid	Group 4-A wastes
Hypochlorites	Other flammable and combustible wastes
Nitrates	
Nitric acid, fuming	
Perchlorates	
Permanganates	
Peroxides	
Other strong oxidizers	

Potential consequences: Fire, explosion, or violent reaction.

Source: "Law, Regulation, and Guidelines for Handling of Hazardous Waste."

California Department of Health, February 1975.

To ensure permit compliance, the following outfall limitations and requirements SHALL be maintained:

Cooling Pond Discharge - Outfall 001

NOTE

Discharges via this outfall must also comply with state water quality standards.

1. Daily maximum flow SHALL NOT exceed 200 MGD.
2. Daily average flow SHALL NOT exceed 144 MGD.
3. Daily average temperature SHALL NOT exceed 35°C (95°F).
4. Daily maximum temperature SHALL NOT exceed 36.1°C (97°F).
5. pH SHALL be maintained between 6.0 and 9.0 standard units.
6. There SHALL be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil.
7. Total residual chlorine SHALL be maintained below detectable levels.
8. Biomonitoring SHALL NOT exhibit chronic toxicity as defined in TCEQ Permit No. 01908.

Neutralization Basin - Outfall 101

1. The daily maximum total suspended solids SHALL NOT exceed 100 mg/l.
2. The daily average for total suspended solids SHALL NOT exceed 30 mg/l.
3. The daily maximum for oil and grease SHALL NOT exceed 20 mg/l.
4. The daily average for oil and grease SHALL NOT exceed 15 mg/l.
5. There SHALL be no discharge of visible foam or floating solids in other than trace amounts and no discharge of visible oil.

Oily Waste Treatment System - Outfall 201

1. The daily maximum for total suspended solids SHALL NOT exceed 100 mg/l.
2. The daily average for total suspended solids SHALL NOT exceed 30 mg/l.
3. The daily maximum for oil and grease SHALL NOT exceed 20 mg/l.
4. The daily average for oil and grease SHALL NOT exceed 15 mg/l.
5. There SHALL be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil.

West Sanitary Waste Treatment System - Outfall 401

1. The daily maximum Biochemical Oxygen Demand (5-day) SHALL NOT exceed 45 mg/l.
2. The daily average Biochemical Oxygen Demand (5-day) SHALL NOT exceed 20 mg/l.
3. The daily maximum for total suspended solids SHALL NOT exceed 45 mg/l.
4. The daily average for total suspended solids SHALL NOT exceed 20 mg/l.
5. There SHALL be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil.

Metal Cleaning Waste - Outfall 501

1. The daily maximum for total iron SHALL NOT exceed 1 mg/l.
2. The daily average for total iron SHALL NOT exceed 1 mg/l.
3. The daily maximum for total copper SHALL NOT exceed 1 mg/l.
4. The daily average for total copper SHALL NOT exceed 0.5 mg/l.
5. There SHALL be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil.

Training Sanitary Waste Treatment System - Outfall 601

1. The daily maximum Biochemical Oxygen Demand (5-day) SHALL NOT exceed 45 mg/l.

2. The daily average Biochemical Oxygen Demand (5-day) SHALL NOT exceed 20 mg/l.

3. The daily maximum for total suspended solids SHALL NOT exceed 45 mg/l.

4. The daily maximum for total suspended solids SHALL NOT exceed 20 mg/l.

5. There SHALL be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil.

To ensure permit compliance the following emission limitations and requirements SHALL be maintained for the Auxiliary Boiler:

1. The following maximum allowable emission rates SHALL be maintained:

   a. 0.3 lb/mm BTU and 55 lb/hr oxides of nitrogen

   b. 0.24 lb/mm BTU and 44.4 lb/hr sulfur dioxide

   c. 0.1 lb/mm BTU and 18.3 lb/hr particulates

   d. 15.24 lb/hr carbon monoxide

   e. 1.01 lb/hr volatile organic compounds

2. Emission opacity SHALL NOT exceed 15 percent averaged over a six minute period.

3. The emission point (Auxiliary Boiler) SHALL be fired only with No. 2 fuel oil with a sulfur content no greater than 0.30 percent by weight.

4. During load operation greater than 30 percent, feedback control from the oxygen monitor SHALL continuously maintain Low Excess Air (LEA) air/fuel ratio parameters in the combustion mixture. In lieu of the use of feedback control from the oxygen monitor, the boiler may be manually operated within a range of between 2.5 and 10 percent excess oxygen in the flue gas.

This addendum provides guidance on the types of changes to the facility that require a Nonradiological Environmental Evaluation per 0PGP03-ZA-0017, Nonradiological Environmental Evaluations.

A Nonradiological Environmental Evaluation is required if all or a portion of a plant design change (including installation, construction, modification, or operation and maintenance of the change) alters, adds, deletes or impacts any of the following subordinate issues.

1. **Change to the Environmental Protection Plan (EPP) or change that could potentially constitute an unreviewed environmental question as defined in Appendix B to the Operating License?**
   Note that implementation of changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment. Such changes include, but are not limited to:

   - Impact to previously undisturbed area(s) of the site
   - A matter that may result in an increase in any adverse environmental impact previously evaluated in the Final Environmental Statement – Operating License, environmental impact appraisals or in any decisions of the Atomic Safety and Licensing Board [or successor organization]
   - A matter not previously reviewed and evaluated in the Final Environmental Statement – Operating License, environmental appraisal or decision of the Atomic Safety and Licensing Board [or successor organization]
   - A change in effluents or power level
   - Change increases potential to result in significant environmental impact that could be causally related to plant operation (Examples: fish kills; increase in nuisance organisms or conditions; unanticipated or emergency discharge of waste water or chemical substances; or impact to any onsite species protected by the Endangered Species Act)
   - Modification to station structures, systems or components that could potentially affect the continued protection of the environment

2. **Change could impact the site's ability to comply with conditions of applicable wastewater discharge permit(s)?**
   Such changes include, but are not limited to:

   - Potential to alter the nature or increase the quantity of pollutants discharged in plant effluents
   - Structural changes to Main Cooling Reservoir, Reservoir Makeup Pumping Facilities or blowdown facilities or monitoring capabilities
   - Re-location or change to designated discharge points
   - Potential to alter effluent flow rates, concentrations or temperatures
   - Structural changes to wastewater treatment systems or monitoring capabilities

3. **Change could materially affect the site's potential for discharges of oils or chemicals?**
   Such changes include, but are not limited to:

   - Commissioning or decommissioning of tanks or bulk containers
   - Replacement, reconstruction or movement of tanks or bulk containers
   - Reconstruction, replacement or installation of piping systems
   - Construction or demolition that might alter secondary containment structures
   - Potential increase in site's oil or chemical storage inventory

4. **Change could impact the site's ability to comply with conditions of applicable storm water discharge permit?**
   Such changes include, but are not limited to:

   - Modifications, including deletions or additions, to structural controls that prevent pollutants from entering storm water collection conveyances such as storm drains, ditches and sloughs.
   - Modifications that include any clearing or grading that would result in the disturbance of one or more acre of land
   - Modifications that impact existing drainage flows

5. **Change could affect the site's water conservation capabilities?**
   Such changes include, but are not limited to:

   - Modifications, including deletions or additions, to procedures or components used for leak-detection, water-loss accounting, water transmission or delivery
   - Process modifications to improve water-use efficiency
   - Increase in production or consumption of non-potable water including well water

6. **Change could impact site's waste generation, minimization or disposal practices?**
   Such changes include, but are not limited to:

   - Potential to generate mixed hazardous and radioactive waste
   - Potential to generate a new or additional non-radioactive waste type
   - Potential to significantly increase generation of existing non-radioactive waste type
   - Change, addition or deletion of onsite waste processing practices

7. **Change or addition to existing potable water systems including water wells?**
   Such changes include, but are not limited to:

   - Changes or additions to the systems' production, treatment, storage or distribution facilities
   - Changes or additions to existing systems that result in an increase in production, treatment, or storage capacity
   - Changes involving disinfection application points, disinfectants used or disinfection processes

8. **Change could impact the site's ability to comply with conditions of applicable air quality permit(s) or alter non-radioactive air emissions?**
   Examples of air emission sources include, but are not limited to, tanks, diesel/electrical generators, boilers, heaters, degreasers, painting/coatings activities, abrasive blasting activities, cooling towers, outdoor burning, refrigerant use, building demolition or renovation activity, etc. Such changes include, but are not limited to:

   - Installation, construction, operation or maintenance of new air emission sources
   - Modification of existing air emission sources-
   - A physical change or change in method of operation of an existing air emission source including changes in fuel, increase in hours of operation, increase in production rate, etc.
   - Installation, operation, cessation, removal/addition or replacement of pollution control or monitoring technology associated with an air emission source
   - Addition or alteration of an existing source of carbon monoxide, oxides of nitrogen, volatile organic compounds, sulfur oxides, particulate matter, lead or ozone depleting chemicals
   - Potential increase in air emissions or air emission points
   - Potential asbestos removal or disturbance

9. **Change could impact site's ability to comply with various water rights permits, contractual agreements or other compliance documents that authorize the site to divert and impound water from the Colorado River?**
   Such changes include, but are not limited to:

   - Structural modifications to the Reservoir Makeup Pumping Facility
   - Potential to increase water use or change the design flow rate
   - Impact to water use monitoring capability
   - Installation, construction, operation or maintenance of structures in or adjacent to navigable waterways e.g. boat ramps, riprap, wharfs, piers, etc.
   - Potential for discharge or deposit of dredged or fill materials into navigable waters or onsite
   - Impacts the use by the public of navigable waters
   - Alterations to the reservoir spillway or embankments

10. **Change could impact site's current land management practices or regulatory obligations?**
    Such changes include, but are not limited to:

    - Potentially result in net loss of existing wetlands
    - Change in designated area for onsite placement of waste material e.g. dredge, Class III waste, beneficial land application of sludge
    - Potentially impact natural resources and wildlife habitat
    - Potentially impact designated set aside areas such as the lowland habitat
    - Change in land use of previously un-impacted areas

Introduction

Pursuant to the regulatory requirements of Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation 36 CFR Part 800 (as amended August 5, 2004) an Area of Potential Effect (APE) associated with construction and operations activities (existing and proposed) at the South Texas Project site has been surveyed and a determination of no adverse effect to historic properties was asserted and concurred with by the Texas Historical Commission (THC) on 01/19/2007. The following Unanticipated Discovery Plan (UDP) outlines procedures to follow in the case of a post review discovery in accordance with 36 CFR Part 800.13.

Discovered cultural resource materials could include human skeletal remains, artifacts, sites, or any other cultural resources eligible, or potentially eligible, for listing in the National Register of Historic Places (NRHP). All cultural resource discoveries are considered confidential and to protect their integrity, the press will not be contacted under any circumstance. This plan is intended to provide guidance to STPNOC and their contractors so they can:

- Comply with any applicable Federal and State laws and regulations, particularly 36 CFR 800 (as amended August 5, 2004) that implements section 106 of the National Historic Preservation Act of 1966, and
- Describe to regulatory and review agencies the procedures agents will follow to prepare for and deal with unanticipated discoveries, and
- Provide direction and guidance to project personnel for the proper procedures to be followed should an unanticipated discovery occur.

Discovery of Cultural Resources

Should construction or maintenance activities cause disturbance to underground cultural/archaeological resources the following section establishes provisions for the professional archaeological treatment of cultural materials discovered.

Provisions of the Cultural / Archaeological Resource Procedures are as follows:

A. If any STPNOC employee, contractor or subcontractor believes that they have uncovered any cultural resource during construction or maintenance activities, all work adjacent to the discovery shall cease. The STPNOC Supervisor responsible for the ongoing work will notify the STPNOC Environmental Manager immediately. A cultural resource discovery could be prehistoric or historic and consist of, but not be limited to:

    - anthropogenic soil horizons, occupational surfaces, middens, etc.,
    - areas of charcoal or charcoal – stained soil and stones,
    - stone tools or waste flakes (i.e. an arrowhead, or stone chips),
    - bones, burned rocks, or other food related materials in association with stone tools or flakes,
    - or a cluster of tin cans or bottles, logging or agricultural equipment older than 50 years.

B. In order to protect the integrity of a discovery the STPNOC Supervisor will take appropriate steps to protect the discovery site by ceasing all work in an area of stoppage adequate to provide for the total security, protection, and integrity of the resource. Vehicles, equipment, and unauthorized personnel will not be permitted to traverse the discovery site. Work in the immediate area will not resume until treatment of the discovery has been completed following provisions for treating archaeological cultural material contained in this addendum.

C. The STPNOC Environmental Manager, arrange for the site to be evaluated by a qualified cultural resources management specialist. If the cultural resources find is determined to be significant, the cultural resource specialist/archaeologist or consulting archaeologist will immediately contact the THC to seek consultation regarding the National Register eligibility of any further discovery. Construction will be halted within the immediate area of the discovery and the scene will be protected until consultation to determine the appropriate course of action has been conducted. The STPNOC Supervisor may direct construction away from cultural resources to work in other areas prior to contacting the concerned parties.

D. Where cultural resources are encountered during construction, but additional project effects to the resources are not anticipated, project construction may continue while documentation and assessment of the cultural resources proceed. The total area of work stoppage will be adequate to provide for the security, protection, and integrity of the discovery. Construction may continue at the discovery location only after the process outlined in this addendum is followed and STPNOC and THC are satisfied the caveats of Section 106 of the National Historic Preservation Act have been met.

E. Routine documentation of newly discovered cultural material should not impact construction schedules. Where complex or extensive cultural remains are encountered, the STPNOC Environmental Manager and archaeological personnel will determine the appropriate level of documentation and treatment of the resource through consultation with THC.

F. STPNOC will ensure the proper documentation and assessment of any discovered cultural resources in cooperation with a contracted consultant and THC. All prehistoric and historic cultural material discovered will be recorded by a professional archaeologist using standard techniques. Where warranted in the opinion of the qualified cultural resources professional, site overviews, features, and artifacts will be photographed; stratigraphic profiles and soil/sediment descriptions will be prepared for subsurface exposures. Discovery locations will be documented on scaled site plans and site location maps.

G. All prehistoric and historic artifacts collected from the surface and from probes and excavation units will be analyzed, catalogued, and temporarily curated. Ultimate disposition of cultural materials will be determined in consultation with the THC.

H. Within 90 days of concluding fieldwork, a technical report describing any and all monitoring and resultant archaeological excavations will be provided to the STPNOC Environmental Manager. The STPNOC Environmental Manager will forward the report to the THC.

I. If assessment activity exposes human remains (burials, isolated teeth, or bones) all defined procedures outlined in the following section will be followed.

Special Procedures for the Discovery of Human Skeletal Material

Any human skeletal remains regardless of ethnic origin, which may be discovered during this project will at all times be treated with dignity and respect.

A. During all project operations if any STPNOC employee or any of the contractors or subcontractors believes that they have made an unanticipated discovery of human skeletal remains, all work adjacent to the discovery shall cease. The area of work stoppage will be adequate to provide for the total security, protection, and integrity of the human skeletal remains. No persons other than the proper law enforcement personnel, STPNOC Cultural Resource Consultant(s), and the THC will be authorized direct access to the discovery location after the area is secured. If the remains are determined to be of Native American ancestry thorough consultation with the THC, tribal access will only be allowed to the designated representative(s) of the affected tribes'. Coordination for tribal member access must go through the designated tribal representative. The strict control of a burial location is mandated to insure the safety and integrity of the burial feature and remains.

B. Representatives of STPNOC are responsible for taking appropriate steps to protect the discovery. The immediate area will be secured to a distance adequate to provide for the total security, protection, and integrity of the resource. Vehicles, equipment, and unauthorized personnel will not be permitted to traverse or enter the discovery site.

C. STPNOC will immediately call the Matagorda County Sheriff's Office and will ensure that an individual competent and qualified to identify human skeletal remains is present. If possible, the ethnic origin, or ancestry, of the discovered human remains will be determined through consultation with the THC, County Coroner and the THC-determined affected tribe. The local law enforcement official may arrange for a representative of the county coroner's office to assist the STPNOC Cultural Resource Staff in the examination of the discovery and together will determine whether it should be treated as a crime scene or as a human burial of Native American ancestry.

D. If disinterment of Native American human remains becomes necessary, the consulting parties, which will include STPNOC, THC, and the affected tribe(s), will jointly determine the final custodian of the human skeletal remains for reinterment.

E. STPNOC and/or the FHWA will make a good faith effort at accommodating requests from the affected tribe(s) to be present after they are notified of discoveries, and prior to the implementation of mitigation measures related to the human remains.