



**Pacific Gas and  
Electric Company**

Diablo Canyon Power Plant  
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PG&E Letter DCL-2008-547

Electronic Submission  
E-Mail PDF Formatted File  
centralcoast@waterboards.ca.gov

December 23, 2008

Roger Briggs  
California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista, Suite #101  
San Luis Obispo, CA 93401-7906

Notification of Intent to Perform Seawater System Rhodamine Dye Testing at Pacific Gas & Electric Company, Diablo Canyon Power Plant (DCPP)

Dear Mr. Briggs:

DCPP is providing notification of intent to perform rhodamine dye testing during the upcoming Pacific Ocean winter storm season. The purpose of the test is to determine if effluent and materials discharged from the intake structure screen wash collection pit (refuse sump) is rapidly drawn back into the Power Plant intake under certain ocean conditions.

Storm generated kelp fragments and other ocean debris are washed from the traveling screen systems into the intake refuse sump. The wash water and suspended materials are pumped to NPDES Discharge Point 003 on the ocean side of the intake cove west breakwater. The planned test would add rhodamine to the screen wash effluent. The dye test will investigate if Outfall from Discharge 003 is transported over the west breakwater by very large high energy waves, resulting in rapid reintroduction to the intake.

The planned test would involve a maximum 30-minute duration addition of rhodamine to the screen wash effluent at an estimated target concentration of 15 parts per million. The refuse sump pumps have a combined flow rating of 8,000 gpm, which would result in the discharge of approximately 240,000 gallons of rhodamine tinted effluent to receiving waters. The effluent will be rapidly dispersed and diluted at the 003 Outfall. Rhodamine detection would subsequently be performed by instrumentation at the intake.

NPDES Permit No. CA0003751 Order 90-09 only references rhodamine in Section 4. Discharge 001B, Auxiliary Salt Water (ASW) Cooling System; "Periodic flow rate testing of this system is performed using a dye, such as rhodamine. The discharger will provide prior notification to the board." Rhodamine discharge is not noted nor prohibited elsewhere in the Permit. DCPP has previously conducted rhodamine testing for systems other than the ASW following advanced notification to the Regional Board (reference PG&E Letter DCL-95-220 to the RWQCB dated September 29, 1995). Board Staff have typically requested inclusion of a summary of dye use and discharge in quarterly reports following testing activities.

COOL  
JES  
NRR



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Concern involving the discharge of rhodamine would primarily be due to potential for temporary localized discoloration of ocean water in the vicinity of the Discharge 003 Outfall, which is at the center of a 1-mile Power Plant marine security exclusion zone. At the remote DCPD location, such effect could be observed only from low flying aircraft or marine vessels in the vicinity. Ocean turbulence and anticipated debris loading would diminish any visual impact. Due to the exclusion zone, and planned test implementation during a significant ocean swell, it is unlikely any temporary visual indication of dye would be witnessed by non-plant related marine craft or aircraft. The test would therefore not be 'aesthetically undesirable' in accordance with Order 90-09 Conditions Section C. Receiving Water limitations, Subsection 2.

The intent is to implement rhodamine testing simultaneous with a very high energy ocean swell during the 2009 winter/spring storm season. Since wave energy that will facilitate a meaningful test is dependent on ocean conditions, an accurate schedule cannot be provided in advance. Therefore, DCPD will verbally notify the CCRWQCB of a test attempt at least two days prior to a projected significant ocean swell. It is possible that a predicted event will not generate wave action adequate to perform the test. Use of rhodamine would then be postponed. Implementation may require multiple stagings. In this case, the facility will provide a follow-up verbal notification once a test attempt is either canceled or initiated.

If you have any questions or concerns regarding this notification, or require additional information, please contact Bryan Cunningham of my staff at (805) 545-4439.

Sincerely,

  
*James M. Welsch*

Kenneth J. Peters  
*Station Director - Diablo Canyon Power Plant*

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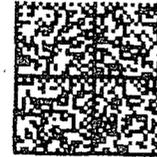
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