



August 20, 2009 L-09-230

Mr. Jeffrey Reidenbaugh Water Management Program Pennsylvania Department of Environmental Protection Southwest Region 400 Waterfront Drive Pittsburgh, PA 15222

#### SUBJECT:

# INFORMATION REQUESTED IN NPDES COMPLIANCE INSPECTION REPORT FOR BEAVER VALLEY POWER STATION NPDES PERMIT PA0025615

Dear Mr. Reidenbaugh,

This letter provides the information you requested in the NPDES COMPLIANCE INSPECTION REPORT, received by FirstEnergy Nuclear Operating Company (FENOC) on July 22, 2009, for the inspection conducted on July 14, 2009.

### **OWS-21 (Internal Monitoring Point 313)**

During the inspection visit, there appeared to be a sheen on the water surface in the waste oil separator (WOS) discharge vault. The vault was vacuum cleaned on July 20, 2009. There was no evidence of oil in the water removed from the vault during vacuum. The disposal vendor reported <1% oil in the disposed water. In addition, the routine weekly samples taken and analyzed since July 14 (date of inspection), were analytically determined to be less than detectable oil and grease (<5 mg/l). Continued observations of the character of the water in the discharge vault have not indicated the presence of oil. Analytical Total Suspended Solids (TSS) results over the same period ranged from 4.8 to 16.4 mg/l.

Subsequent to the inspection, Environmental & Chemistry staff and supervision investigated the work steps carried out during the WOS cleaning that had been performed during the week of July 6. It was determined that the cleaning was performed as written in the work order. Therefore, the maintenance had been performed per established procedures.



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### Unit 1 OWS (Internal Monitoring Point 303)

An apparent light and spotty sheen was observed at the discharge end of the WOS at the time of the inspection, and an absorbent boom was installed at the discharge. The WOS was redesigned, rebuilt, and returned to service in August 2008. In addition to two sets of coalescing plates, the new design also includes a final compartment containing oil-absorbent trickle filter media. BVPS does not yet have history with the new design regarding required frequency to clean the unit. As discussed during the visit, an annual work order to clean the unit was scheduled for September 2009.

The weekly oil and grease sample analyses for July 11 and 14 were less than detectable (<5 mg/ml) and the July 22 sample result was 7.3 mg/ml. Over the past three weeks, however, the average result has been 13.5 mg/l (actual data will be included in the July and August Discharge Monitoring Reports).

In response to that trend, the WOS was isolated to prevent discharge, and will not be returned to service until the unit is cleaned and the trickle filter media replaced. BVPS will evaluate increasing the cleanout and/or filter media replacement frequency to twice per year based on consideration of the analytical data and an inspection of the WOS and filter media.

The maintenance and cleaning of the WOS will include the removal and cleaning of the coalescing plates, pressure-washing all components and surfaces inside the unit, and the installation of new trickle filter oil absorbing media.

## **Erosion/Sedimentation Correction Project**

During the inspection the project was nearing completion, some sedimentation staining was observed from the drains at the bottom of the paved walls. Upon completion of the project on July 20, filter bags were installed in the stormwater catch basins to improve the protection of the stormwater system from potential erosion and sedimentation (the straw bales also remain in use).

During the week of July 27 after several rain storms, minor sediment was observed at one small area of the wall. In response, BVPS installed an additional drain to relieve pressure in that area. Since then, sedimentation has not been observed. Therefore, the project appears to have been effective in correcting the problem.

BVPS will continue to monitor the area and will maintain stormwater protection Best Management Practices (BMP) in the area.

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# Catch Basin near Shippingport Atomic Power Station (SAPS)

During the inspection, a catch basin below the BV switchyard and near SAPS was observed to contain sediment and debris. The debris and sediment were removed, and the straw bales were left in place to protect the stormwater system. This action was completed on August 14.

Should you have any questions, please direct them to Mr. Michael Banko at 724-682-4117.

Sincerely,

Raymond A. Lieb

Director, Site Operations

cc: Document Control Desk US NRC (NOTE: No new US NRC commitments are contained is this letter.)