



April 26, 1994
IPN-94-050

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**State Pollutant Discharge and Elimination System (SPDES) Permit
Notices of Non-Conformance**

Reference: 1) NYPA letter dated December 21, 1992 (IPN-92-056) to NRC,
transmitting the Indian Point Station Discharge Monitoring Report for the
month of September 1992.

Dear Sir:

The purpose of this letter is to inform you of a "non-compliance" with the Indian Point station's State Pollutant Discharge and Elimination System (SPDES) permit regarding discharge of untreated sewage, and to provide you with updated information regarding the "non-conformance" reported by Reference 1.

Section 3.2 of the Indian Point 3 Non-Radiological Environmental Protection Plan (Part I of Appendix B to the Facility Operating License) requires that violations of the SPDES permit be reported to the NRC by submitting a copy of the reports required by the permit. In the past, the term "violation" has been interpreted to include non-conformances with SPDES permit conditions whether or not a violation was cited by the New York State Department of Environmental Conservation (NYS DEC).

A New York Power Authority letter to the NYS DEC dated July 13, 1993, reported an incident regarding discharge of untreated sewage through outfall 001J as a "non-compliance" of SPDES permit conditions. While this non-compliance has not been cited by the NYS DEC as a violation of the SPDES permit, Attachment I provides, for your information, a copy of the letter reporting the incident and a subsequent letter outlining the corrective actions taken.

Reference 1 provided a copy of a Notice of Non-Conformance regarding an ongoing failure to maintain the required head differential in the discharge canal. The Notice reported that repair was planned for May 1993. Upon inspection, additional repairs were deemed necessary; the Indian Point Station Discharge Monitoring Report (DMR) for the month of January 1994 stated that the repairs were expected to be completed by April 1, 1994. The repairs completed to date (including all "in-water" work) are sufficient to satisfy the SPDES Operation Permit. Attachment II provides, for your information, a copy of the updated Notice

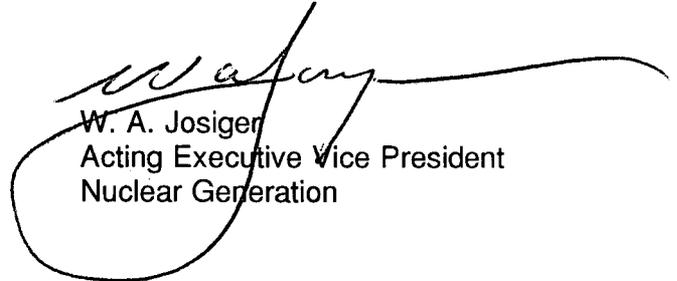
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Pool
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and the cover letter of the January 1994 DMR transmitting the updated Notice to the NYS DEC.

There are no commitments associated with this letter. If you have any questions regarding this matter, please contact Mr. P. Kokolakis.

Very truly yours,



W. A. Josiger
Acting Executive Vice President
Nuclear Generation

Attachments I and II

cc: U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector's Office
Indian Point Unit 3
U. S. Nuclear Regulatory Commission
P. O. Box 337
Buchanan, NY 10511

Mr. Nicola F. Conicella, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
U. S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, DC 20555

ATTACHMENT I TO IPN-94-050
DISCHARGE OF UNTREATED SEWAGE
LETTER OF NOTIFICATION TO NYS DEC

INDIAN POINT GENERATING STATION
STATE POLLUTANT DISCHARGE AND ELIMINATION SYSTEM (SPDES)
PERMIT NO. 000 4472



New York Power
Authority

July 13, 1993
JJK-93-81

Mr. Joseph Marcogliese
New York State Department of
Environmental Conservation
202 Mamaroneck Avenue
White Plains, NY 10601

Subject: Spill Report #93-04363
SPDES Permit #00- 4472

Mr. Marcogliese:

As reported to your department of July 7, 1993, untreated sewage was found entering our storm drain system and being discharged via outfall 001J. The source of the sewage was identified and stopped, and the problem corrected. Details of the incident are provided below, in accordance with the conditions of our SPDES permit.

Description of Non-Compliance and Its Causes

Untreated sewage was found to be entering our storm drain system and was being discharged to our canal and the river via outfall 001J.

Period of Non-Compliance

The presence of untreated sewage in the storm drain was confirmed, via fecal coliform analytical results on 7/6/93 at 1200. The source of the sewage (leaking sanitary line) was identified and isolated by 1300 on 7/7/93, and the storm drain discharge stopped by 1530 on the same day.

Steps Taken to Reduce, Eliminate and Prevent Recurrence

While the source of the sewage was being identified and isolated, the storm drain discharge was chlorinated, as decided in conversation with Mr. Arthur Crawford of your staff on 7/7/93. A TRC of between 0.5 and 3ppm was maintained until the discharge was terminated.

As soon as the source was identified, immediate corrective action consisted of isolation of the leaking sewage line, followed by termination of the storm drain's discharge to the river. The sanitary line identified as the source was replaced in order to provide a long term solution to the problem. Further investigation revealed the presence of another deteriorated line which is also being replaced to prevent recurrence of this incident.

Should you have any further questions about this matter, please call Mr. M. Kerns at (914) 736-8451.

Sincerely,

Charlene D. Faison

for

John J. Kelly
Director, Radiological &
Environmental Services

cc: Chief Compliance Section
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

JJK:CHT



August 3, 1993
JJK-93-98
JMK-93-48

Mr. Joseph Marcogliese
New York State Department of
Environmental Conservation
202 Mamaroneck Avenue
White Plains, NY 10601

Subject: Spill Report # 93-04363
SPDES Permit # 000 4472

Mr. Marcogliese:

We recently reported to you on the status of remediation activities associated with the above referenced sewage line problem. As discussed with Mr. Arthur Crawford on July 23, 1993, this event has been resolved and closed. A summary of the corrective actions taken is provided below.

The immediate corrective actions already reported included diversion of the sewage line, as well as temporary termination of the storm drain into which the sewage had leaked. In summary, the investigative and permanent corrective actions taken to closeout this incident were:

- o the broken pipe and transfer isolation valve in the valve pit were removed and replaced.
- o restrictions to flow in the line to the lower lift station have been removed.
- o a video inspection of the piping identified two additional pipe failures; they were excavated and repaired.
- o dye testing indicated no further failures.
- o the transformer area moat liquid level was determined, and indicated no need for pumpout.
- o the valve pit was filled with sand to provide insulation and prevent future freezing.

- o the excavated areas were back filled with sand to prevent fracture of underground services in the future.

Should you have any additional questions regarding this incident, please contact Mr. Matthew Kerns of IP-3 at (914) 736-8451.

Sincerely,



Mr. J.J. Kelly
Director
Radiological & Environmental Support

cc: Chief Compliance Section
New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233

bcc: D. Quinn
M. Kerns
D. Gray
J. Greco
J. Comiotes
E. Louie - Con Edison
RMS

ATTACHMENT II TO IPN-94-050

EXCERPTS FROM INDIAN POINT STATION
DISCHARGE MONITORING REPORT (DMR)
FOR MONTH OF DECEMBER 1993

INDIAN POINT GENERATING STATION
STATE POLLUTANT DISCHARGE AND ELIMINATION SYSTEM (SPDES)
PERMIT NO. 000 4472

February 22, 1994



Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

NYSDEC - Division of Water
Source Surveillance Section
Bureau of Wastewater Facilities Operations
50 Wolf Road - Room 320
Albany, New York 12233-3506

Re: Monthly Discharge Monitoring Report
Permit #0004472
Con Edison Indian Point Units 1 & 2
New York Power Authority Indian Point Unit 3

Gentlemen:

Enclosed are the Discharge Monitoring Reports (DMR) for the month of January 1994. A Report of Noncompliance Event is attached.

Explanation for deviations from the permitted circulator flows are forwarded to the Department of Environmental Conservation as they occur and, therefore, are not enclosed.

If you have any questions regarding this submission, please contact Mr. Reynolds Burns of Con Edison at (914)734-5605 or Mr. Mathew Kerns of New York Power Authority at (914)736-8452.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Stephen E. Quinn", written over a horizontal line.

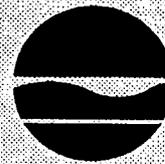
Stephen E. Quinn
General Manager
Nuclear Power Generation
Con Edison, Indian Point
1 and 2

Attachment

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SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Cesare, Manfredi DEC Region: 3

Report Type: 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-0004472 Facility: Indian Point Units 1, 2 and 3

Date of noncompliance: 01/1/94 Location (Outfall, Treatment Unit, or Pump Station): Discharge Canal

Description of noncompliance(s) and cause(s): THE INDIAN POINT SITE HAS BEEN UNABLE TO MAINTAIN THE REQUIRED 1.75-FOOT HEAD DIFFERENTIAL IN THE DISCHARGE CANAL UNDER ALL OPERATING CONDITIONS. THIS WAS ORIGINALLY BELIEVED TO HAVE BEEN DUE TO A COMBINATION OF EROSION FROM BENEATH THE GATES AND WITH THE GATE OPERATION. FURTHER INSPECTION PERFORMED DURING THE COURSE OF THE ONGOING REPAIR PROGRAM REVEALED THAT ADDITIONAL STRUCTURAL REPAIRS TO THE DISCHARGE CANAL ARE NECESSARY (see letter of June 18, 1993 from NYPA to DEC).

Has event ceased? (Yes) (No) If so, when? _____ Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 1/1, _____: _____ (AM) (PM) End date, time of event: 1/1, _____: _____ (AM) (PM)

Date, time oral notification made to DEC? 1/1, _____: _____ (AM) (PM) DEC Official contacted: _____

Immediate corrective actions: _____

Preventive (long term) corrective actions: REPAIR WORK TO CORRECT THE GATES PROBLEMS IS COMPLETED. THE NEW REPAIR ACTIVITIES ARE EXPECTED TO BE COMPLETED BY APRIL 1, 1994.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 1/1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Reynolds Burns Title: Chemistry Manager Date: 02/23/94

Phone #: (914) 734-5605 Fax #: (914) 736-5562

To: SPDES Permittees
From: Robert Townsend, P.E., Chief, Compliance Section, Bureau of Wastewater Facilities Operations, Division of Water
Subject: Standardized Noncompliance Report

To facilitate the reporting of noncompliance events, the Division of Water has developed this standardized form. According to the SPDES Permit General Conditions Part II, Section 5(b), noncompliance which may endanger health or the environment must be reported orally within 24 hours and also in writing within five (5) days. Other noncompliance as defined in Section 5(c) shall be reported as attachments to the Discharge Monitoring Report (DMR). This form should be used for these events as well as to report noncompliance relating to consent orders, scheduled events and bypass events.

By using this form all necessary information can readily be reported to DEC. Any additional information required to describe the event can be attached. Please make additional copies of this form and use as needed. Instructions are provided below. Please contact the Division of Water, Bureau of Wastewater Facilities Operations at 518-457-3790 for questions on form use. Thank you for your cooperation.

Instructions to complete and submit Noncompliance Report

1. Provide facility information and all applicable event details in Sections 1 through 3. Dates should be completed in month/day/year format.
2. Provide your name, title, business phone number, and date report was completed in Section 4. Use additional sheets as needed to provide full detail of the event in Section 2.
3. For 24-hour and 5-day reports, mail or fax the completed form to the appropriate DEC Regional Office listed below. Attach all other noncompliance reports to the DMR submittal or mail separately as related to consent order/scheduled event noncompliance. Note that 24-hour and 5-day reports are required only if the noncompliance endangers health or the environment. After hours and weekend reporting of health or environment threatening noncompliance must be reported through the DEC Telephone Hotline, which is 1-800-457-7362.

DEC Regional Offices:

| | | |
|--|---|--|
| <p>REGION 1</p> <p>Robert Schneck, RWE SUNY Stony Brook Campus, Bldg. 40 Stony Brook, NY 11790-2356 Phone: 516-444-0405 Fax: 516-444-0373</p> <p>Counties: Nassau Suffolk</p> | <p>REGION 2</p> <p>Rich Newman, RWE One Hunters Point Plaza 47-40 21st St. Long Island City, NY 11101-5407 Phone: 718-482-4933 Fax: 718-482-4954</p> <p>Counties: Queens Bronx New York Kings Richmond</p> | <p>REGION 3 **</p> <p>Cesare Manfredi, RWE Region 3 Suboffice 200 White Plains Ave, 5th Floor Tarrytown, NY 10591-5805 Phone: 914-332-1835 Fax: 914-332-4670</p> <p>Counties: Rockland Dutchess Sullivan Orange Ulster Putnam Westchester</p> |
| <p>REGION 4</p> <p>Fred Sievers, RWE 2176 Guilderland Ave. Schenectady, NY 12306-4498 Phone: 518-382-0680 Fax: 518-382-1065</p> <p>Counties: Albany Otsego Columbia Rensselaer Delaware Schoharie Greene Schenectady</p> | <p>REGION 5 **</p> <p>Wiley Lavigne, RWE Route 86, P.O. Box 296 Raybrook, NY 12977-0296 Phone: 518-891-1370 Fax: 518-891-4520</p> <p>Counties: Clinton Hamilton Essex Saratoga Franklin Warren Fulton Washington</p> | <p>REGION 6 **</p> <p>Jim Luz, RWE Region 6 Suboffice State Office Bldg. 207 Genesee St. Utica, NY 13500 Phone: 315-793-2554 Fax: 315-793-2748</p> <p>Counties: Lewis Herkimer Oneida Jefferson St. Lawrence</p> |
| <p>REGION 7</p> <p>Lee Flocke, RWE 615 Erie Blvd West Syracuse, NY 13204-2400 Phone: 315-426-7500 Fax: 315-426-7402</p> <p>Counties: Broome Madison Cayuga Onondaga Chenango Oswego Cortland Tioga Tompkins</p> | <p>REGION 8</p> <p>Frank Ricotta, RWE 6274 East Avon-Lima Rd Avon, NY 14414-9519 Phone: 716-226-2466 Fax: 716-226-2466</p> <p>(Operator) Counties: Orleans Chemung Schuyler Genesee Seneca Livingston Steuben Monroe Wayne Ontario Yates</p> | <p>REGION 9</p> <p>John McMahon, RWE 270 Michigan Avenue Buffalo, NY 14203-2999 Phone: 716-851-7070 Fax: 716-851-7009</p> <p>Counties: Allegany Erie Cattaraugus Niagara Chautauqua Wyoming</p> |

** **REGION 3 Suboffice**
 Regional Water Staff
 21 So. Putt Corners Rd
 New Paltz, NY 12561-1696
 Phone: 914-255-5453
 Fax: 914-255-3042

** **REGION 5 Suboffice**
 Regional Water Staff
 Box 220, Hudson St Extension
 Warrensburg, NY 12885-0220
 Phone: 518-623-3671
 Fax: 518-623-3603

** **REGION 6 Suboffice**
 Regional Water Staff
 317 Washington St.
 Watertown, NY 13601-3787
 Phone: 315-785-2513
 Fax: 315-785-2422