



**Luminant**

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December 21, 2010

TXX#: 10169

CERTIFIED MAIL  
7005 2570 0000 8283 0276

Texas Commission on Environmental Quality  
Public Drinking Water Section MC 155  
P.O. Box 13087  
Austin, Texas 78711-3087

Attn: Public Notice

Luminant Comanche Peak NPP  
PWS #2130016  
Monitoring Violation – Public Notice

Dear Sir/Madam:

Attached are the Notice of a Routine Monitoring Violation for Disinfectant Residual and the corresponding Certificate of Delivery of Public Notice to Customers by a Public Water System for the above referenced PWS in accordance with 30 TAC 290.110(g)(5) and 290.122(c).

This action is required due to a loss of distribution free chlorine residual records for this system for the month of October 2010 (1/day requirement). There is no reason to believe that the residuals were not measured, but the documentation is not available. As indicated in the Public Notice document, the Company has documentation which indicates that appropriate chlorine residual levels were maintained, including: 1. sodium hypochlorite usage logs; 2. Entry Point chlorine residual data; 3. Bacteriological test results and corresponding distribution chlorine residual data. Additionally, involved personnel recall no unusual data and any high or low residual readings would have required immediate response and appropriate documentation.

Residuals recorded with the bacteriological samples will be reported in the Disinfectant Level Quarterly Operating Report (DLQOR) for the 4<sup>th</sup> Quarter 2010 which will be submitted in January 2011.

If you have any questions concerning this Public Notice or related matters, please contact David Rutledge at 214-875-8296 or by e-mail at david.rutledge@luminant.com.

Sincerely,

*Rafael Flores*  
Raphael Flores

*Kim Mireles*  
By: Kim Mireles

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

*JEAS*  
*NRR*

CC: Ms. Marissa Ludwig  
TCEQ, Region 4  
2309 Gravel Drive  
Fort Worth, TX 76118-6951

US Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

## **Notice of a Routine Monitoring Violation for Disinfectant Residual**

**Comanche Peak Nuclear Power Plant, PWS #2130016**, failed to maintain the required documentation of the required daily samples for disinfectant residual monitoring of the water in the distribution system during October 2010. This monitoring is required by the Texas Commission on Environmental Quality's "Drinking Water Standards" and the federal "Safe Drinking Water Act," Public Law 95-523. Failure to monitor or monitoring inadequately makes it impossible to know if there is the required minimum disinfectant residual requirement of 0.2 mg/l (ppm) of chlorine. Our water system is required to take a disinfectant residual sample each day. Failure to collect and document all required disinfectant residual samples is a violation of the monitoring requirements and we are required to notify you of this violation.

### **Circumstances:**

This situation arose due to a loss of data from all routine monitoring which was conducted according to Site Environmental activity logs. The following information is provided as further evidence that appropriate chlorine residuals were maintained during the month:

1. Sodium hypochlorite (the chlorine source) usage was normal and in-line with expected use based on previous and subsequent months usage.
2. In-line monitoring of chlorine residuals at the entry points to the system were normal during the month.
3. Required bacteriological testing of the system indicated no contamination and corresponding chlorine residuals on these samples were in the normal range.
4. Personnel involved recall no below minimum samples. Such samples would have required immediate action to elevate the residuals in accordance with procedure.

Appropriate actions are being taken to assure that such a data loss does not occur again (CR2010-010892).

**If you have any questions regarding this violation, you may contact Bruce Turner at 254-897-8901 or David Rutledge at 214-875-8296.**

PWS/ 2130016 /CO  
(Fill in PWS ID NUMBER)

TCEQ-20208 (Revised 6/2005)

## Certificate of Delivery of Public Notice to Customers by a Public Water System

After notifying your customers of a violation, complete this form and submit it with a copy of the public notice to the Texas Commission on Environmental Quality at the address given below.

Public Water System (PWS) Name: Luminant Comanche Peak NPP  
PWS ID (7-digit number required): 2130016  
Constituent (enter name of each chemical): Chlorine Residual  
Violation occurred in Quarter (check all that apply)  1 (Jan 1–Mar 31) of year \_\_\_\_\_  
 2 (Apr 1–Jun 30) of year \_\_\_\_\_  
 3 (Jul 1–Sep 30) of year \_\_\_\_\_  
 4 (Oct 1–Dec 31) of year 2010

This notice is for Quarter 4th of year 2010

I certify that the following information is true and accurate:

- The PWS named above has distributed the public notice (PN) for the constituent in violation and for the time period listed above by:
  - Mail or direct delivery, to bill-paying customers as required by 30 TAC §290.122 for community water systems
  - Continuous posting or direct delivery as required by 30 TAC §290.122 for nontransient, non-community water systems; and
- The information contained in this public notification is correct and complies with required public notification content in accordance with 30 TAC §290.122; and
- The above system has made an adequate good-faith effort to reach non-bill-paying consumers by appropriate methods (check all below that apply):
  - Posting the PN on the Internet at www. \_\_\_\_\_
  - Mailing the PN to postal patrons within the service area that do not receive a bill
  - Advertising the PN in news media
  - Publication of PN in local newspaper
  - Posting the PN in public places
  - Delivery of multiple copies to single bill addresses serving several persons
  - Delivery to community organizations
  - E-mail notification

Date Public Notice Delivered to Customers: December 21, 2010  
Certified by: Name (print): Kim Mireles Title: Director, Environmental Generation  
Phone: 214-875-8382 Date: 12/21/2010

Signature: Kim Mireles

Send one copy of this completed form and one copy of the Public Notification that you delivered to your customers to:

TCEQ  
Public Drinking Water Section MC 155  
Attn: Public Notice  
PO Box 13087  
Austin TX 78711-3087