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 AUTH. NAME AUTHOR AFFILIATION
 RIVERS, M. E. Tennessee Valley Authority
 RECIP. NAME RECIPIENT AFFILIATION
 PIZNAR, T. G. Alabama, State of

SUBJECT: Forwards comments on draft NPDES Permit AL0024635 in response to 861009 request.

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NOTES: DIA icy. Application for permit renewal filed. 05000438
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TENNESSEE VALLEY AUTHORITY

KNOXVILLE, TENNESSEE 37902

NOV 10 1986

50-4381 439

Ms. Treena G. Piznar
Environmental Engineer
Industrial Branch, Water Division
Alabama Department of Environmental
Management
1751 Federal Drive
Montgomery, Alabama 36130

Dear Ms. Piznar:

BELLEFONTE NUCLEAR PLANT (BLN) - NPDES PERMIT NO. AL0024635 - REVIEW OF
DRAFT PERMIT

This is in response to your October 9 letter to me requesting comments on
the proposed draft NPDES permit for BLN. Our comments are enclosed and
are primarily for clarification purposes.

We greatly appreciate your efforts in helping us to obtain a workable
permit. If there are any questions regarding these comments, please call
Madonna Martin of my staff at (615) 632-6695.

Sincerely,

Martin E. Rivers
Martin E. Rivers, Director
Environmental Quality

Enclosure

cc (Enclosure):

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TVA COMMENTS ON BELLEFONTE NUCLEAR PLANT (BLN)
DRAFT NPDES PERMIT NO. AL0024635

1. Part I, Page I-1a, DSN 002 and DSN 004

The draft permit proposes a reduction in the daily average total suspended solids limitation for these discharges from the present 60 milligrams per liter (mg/l) to 30 mg/l. TVA requests an explanation of the basis for this reduction because additional treatment may be necessary to comply with the more stringent effluent limitation. Monitoring data from January 1981 through September 1986 for both points indicate the 30 mg/l limitation would have been exceeded 33 times while the 60 mg/l daily average limitation was not exceeded 1 time.

2. Part I, Page I-1c, DSN 003

In footnote 4 the sump collection pond discharge is erroneously referred to as DSN 007. The BLN outfalls have been renumbered in the draft permit and the sump collection pond is now identified as DSN 003G.

3. Part I, Page I-1d, DSN 003A

- A. The generic language authorizing discharge from the point source identified by this page implies discharge to a publicly owned treatment works (POTW). This is not the case for any of the permitted BLN discharges. DSN 003A is routed to the condenser circulated water system.
- B. For clarification, totalized flow at this point is a simple addition of tank volumes released throughout the day (i.e., a 24-hour period). A mechanical flow totalizer is not available.
- C. For clarification, the four-star footnote symbol applying to limitations and monitoring requirements should be denoted within the section of this page identifying the limitations and monitoring requirements for this point source.

4. Part I, Page I-1e, DSN 003B

- A. Comment 3.A concerning discharge to a POTW also applies to this point source.
- B. The draft permit requires composite samples for total suspended solids and five-day biochemical oxygen demand. The permit in effect at the present time specifies grab samples for these parameters. We believe grab samples should continue to be acceptable for this discharge point. Based on the nature of a sewage sandfilter, one would not expect a significant variation in effluent quality over a day.

5. Part I, Page I-1f, DSN 003C

- A. Comment 3.A concerning discharge to a POTW also applies to this point source.
- B. For clarification, flow monitoring for this discharge point is by pump log.

6. Part I, Page I-1g, DSN 003D

- A. Comment 3.A concerning discharge to a POTW also applies to this point source.
- B. Design drawings for the cooling tower blowdown line provide for inpipe flow measurement and recording device. These devices are to be installed and operational by unit 1 startup. However, under the present status of construction, the minimal flow through the cooling tower basin will be measured as instantaneous flow over a rectangular weir.
- C. Limitations and monitoring requirements for chromium and zinc should only be applicable when these chemicals are added for cooling tower maintenance. This is clearly the intent of the Steam Electric Guidelines and was reflected as such in the existing permit.

7. Part I, Page I-1i, DSN 003E and DSN 003F

- A. Comment number 3.B concerning totalized flow is also applicable to this discharge point.
- B. Compositing grab samples are specified for oil and grease (O&G) for this discharge. Composite sampling for O&G is not allowable by the regulations because of the tendency of oily substances to adhere to container surfaces during the compositing process. This results in a final composite sample which is not representative of the actual O&G concentrations of the individual discharges. TVA requests that monitoring requirements for O&G be at a frequency of two per week and the sample type be grab from one batch per day. This would be consistent with the existing procedure.
- C. Footnote 1 for DSN 013 from the existing permit should be added.

8. Part I, Page I-1j, DSN 003G

- A. For clarification, comment 3.B is also applicable to this discharge.
- B. The three-star footnote should not apply to the total residual chlorine (TRC) monitoring requirements. Chlorinated water can be routed to the sump collection pond; therefore, each discharge should be sampled for TRC.

9. Part I, Page I-1k, DSN 005

Grab sampling is specified for free available chlorine (FAC) at this discharge. Is "grab" defined here as actually multiple grabs as defined for FAC at DSN 003D?

10. Part I, Page I-11, DSN 006

For clarification, flow monitoring for this discharge point is by pump log.

11. Part I, Page I-1m, DSN 007

A. In regard to the four-star footnote, TVA wishes to make the following clarification. TVA previously requested and was granted permission to route this discharge either to the effluent of DSN 001 following in-pond treatment to meet effluent limitations or through the construction sewage treatment plant (DSN 001) for treatment. This discharge/treatment scheme is reflected by the present permit. TVA requests that these two discharge/treatment options remain available. However, it is understood that routing of DSN 007 to the effluent of DSN 001 is the normal discharge routing and does not require ADEM approval for each batch discharge from the pond. Routing of DSN 007 flow through the construction sewage treatment plant to provide further treatment does, however, require prior approval by ADEM.

B. Also, the four-star footnote includes a reference to limitations and monitoring requirements for zinc among other parameters. TVA believes this was a typographical error and that iron should be listed instead of zinc.

12. Part I, Page I-4, Section 6.C

The language requiring a description of the steps taken to reduce or eliminate a noncomplying discharge has been omitted. Also, the language explaining the permittee's requirements for a reduction, suspension, or termination of monitoring and/or reporting has been omitted. This was previously contained in sections 7.a and 7.b of Part I of the present permit.

13. Part I, Page I-5, Section C.1.a

This statement omits DSN 003A, B, C, D, E, F, and G and includes DSN 008 for which there are no effluent limitations.

14. Part II, Page II-2, Section 5.a.1

This item eliminates the 24-hour oral reporting conditions and requires submission of physical evidence within 24 hours of becoming aware of the upset. Submission of evidence was previously on a 5-day time period. TVA requests a return to the 5-day submittal period or an explanation as to why written information needs to be provided within 24 hours.

15. Part II, Page II-7, Section B.11

The phrase, "except as allowed on pages I-1o through I-1q" should be added to the end of the first sentence.