

September 28, 2011 L-11-315

Ms. Amanda Schmidt Department of Environmental Protection Beaver Falls District Office Bureau of Water Quality Management 715 15th Street Beaver Falls, PA 15010

## SUBJECT: Beaver Valley Power Station Response to Compliance Inspection Report for (NPDES) Permit No. PA0025615

Ms. Schmidt:

This is in response to the Pennsylvania Department of Environmental Protection (DEP) Compliance Inspection Report (CIR) dated August 31, 2011 for an inspection conducted at Beaver Valley Power Station (BVPS) on June 14 and 15, 2011. The CIR noted three observed conditions that could cause or contribute to violations of the Clean Streams Law.

The DEP requested a written report of corrective actions by October 3, 2011.

## **Condition 1: Silt Fence**

A silt fence west of the plant was identified as needing to be replaced. That action was added into the FENOC work management program and is in the planning stage. We expect the condition to be corrected by November 1, 2011.

## **Condition 2: Stormwater System Piping**

FENOC identified unsealed and degraded joints in the BVPS building and yard drains system (stormwater) as a pathway to groundwater. A formal project is underway to repair (e.g., sleeve or seal) separated joints in the system. That project is expected to be completed by year's end. Groundwater monitoring will continue in accordance with the established programs and procedures developed by FENOC as part of an US nuclear power industry-wide initiative. Our programs and procedures are reviewed by the US Nuclear Regulatory Commission (USNRC) and the DEP's Bureau of Radiation Protection.

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## **Condition 3: Outfall 004 Deflection Boom**

During the inspection, the boom appeared to be loose and its ability to handle the foam being generated at the outfall was challenged. The boom was re-set and is currently stable. The installation of a replacement boom was entered into our work management process. It should also be noted that less foam is being generated. During the inspection, the Unit 1 Cooling Tower was in a non-usual configuration which allowed for more flow than normal. With the return to normal configuration, less foam is being generated and the current boom is not being challenged.

An additional item noted during the inspection was the condition of the Paint Shop door and FENOC's plans. Compensatory actions, to clean and minimize any rust challenge to stormwater, as well as the prevention of fugitive dust, will continue until the final repairs are made to the door and seal plate. That project is in the planning and estimating stage. We expect completion by May 1, 2012.

Also as requested, we have added the Beaver Falls District Office to the monthly DMR distribution list.

Please contact Mr. Michael Banko at 724-682-4117 with any questions.

Sincerely,

Raymond A. Lieb Director, Site Operations

cc: Document Control Desk US NRC (NOTE: No new US NRC commitments are contained in this letter.) US Environmental Protection Agency Lawrence E. Ryan, DEP/BRP, BV-SIM-2