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SUBJECT: "NMP Unit 2 Annual Environ Operating Rept for 980101-1231."  
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April 27, 1999  
NMP2L 1864

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Nine Mile Point Unit 2  
Docket No. 50-410  
NPF-69

**Subject:** *Transmittal of 1998 Annual Environmental Operating Report*

Gentlemen:

In accordance with Appendix B of the Operating License (Environmental Protection Plan) for Nine Mile Point Nuclear Station (NMPNS) Unit 2, enclosed is the Annual Environmental Operating Report for the period January 1, 1998 through December 31, 1998.

In the event you have any questions concerning the report, please contact Janet Marsden, Supervisor Environmental Protection at Nine Mile Point (315) 349-4200.

Very truly yours,

Nick Paleologos  
Plant Manager - NMP2

NCP/KES/kap  
Enclosure

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xc: Mr. H. J. Miller, Regional Administrator, Region I  
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**NIAGARA MOHAWK POWER CORPORATION**

**ANNUAL ENVIRONMENTAL OPERATING REPORT**

January 1, 1998 - December 31, 1998

for

**NINE MILE POINT NUCLEAR STATION UNIT 2**

Facility Operating License NPF-69  
Docket Number 50-410



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## ANNUAL ENVIRONMENTAL OPERATING REPORT

Section 5.4.1 of the Environmental Protection Plan (EPP), as contained in Appendix B of the Operating License for the Nine Mile Point Nuclear Station Unit 2, requires that an Annual Environmental Operating Report be submitted to the Commission prior to May 1 of each year. The following addresses the requirements found in Section 5.4.1 of the Environmental Protection Plan (EPP) for the submittal of the Annual Environmental Operating Report:

1. Provide summaries and analyses of the results of the environmental protection activities required by Section 4.2 (if any) of the EPP, including a comparison with related preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports; and an assessment of the observed impacts of plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, a detailed analysis of the data and a proposed course of mitigating action shall be provided.

Section 4.2 of the EPP denotes three areas of monitoring:

- Section 4.2.1 (Aquatic Monitoring) has no specific monitoring requirements although it is noted that the Commission will rely on the decisions made by the State of New York under the authority of the Clean Water Act for any requirements. Aquatic monitoring is specified in the station's State Pollutant Discharge Elimination System Permit (SPDES Permit) which is a site permit applicable to Nine Mile Point Nuclear Station Unit 1 and Unit 2. The SPDES Permit requires a limited Aquatic Monitoring Program (referred to in the permit as a Biological Monitoring Program) which, at the present time, is only applicable to Unit 1. Therefore, no Aquatic Monitoring Program is presently required for Unit 2.
- Section 4.2.2 (Terrestrial Monitoring) and Section 4.2.3 (Noise Monitoring) of the EPP also do not contain any monitoring requirements.

2. Provide a list of EPP noncompliances and corrective actions.

A review of the EPP requirements showed that there were two conditions of noncompliance with these requirements during 1998.

**Noncompliance #1:** The 1997 Annual Environmental Operating Report was submitted on May 1, 1998. Pursuant to Appendix B of the Operating License (Environmental Protection Plan) Section 5.4.1, the Annual Environmental Operating Report shall be submitted prior to May 1 to each year.



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To ensure compliance with this requirement, the report will be tracked via the facility Preventive Maintenance/Surveillance Tracking System. Secondly, the procedure that controls the submission of the report will be revised to ensure the report is submitted prior to May 1 of each year.

**Noncompliance #2:** Sections 5.1 of the EPP states "the licensee shall provide for review and audit of compliance with the EPP. The audit shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review shall be maintained and made available for inspection."

Contrary to this requirement a description of the organizational structure for performing the review and audit of the EPP was not defined. The requirement to perform an EPP audit was included in NMPC procedure NDD-ASU. However, description of the organizational structure for performing the review and audit were not included in an implementing procedure. A Deviation Event Report (DER #C-1997-3170) was initiated to evaluate the deviation and provide corrective/preventive actions.

To ensure compliance with this requirement, the description of the organizational structure for performing the review and audit of the EPP was placed in NMPC procedure NDD-ENV.

3. Provide a list of all changes in station design or operation, or of any tests or experiments which involve a potentially significant unreviewed environmental question (non-radiological).

A review of plant records showed that there was one change in station design/operation that involved a potentially significant unreviewed environmental question (non-radiological). An environmental evaluation was performed and the change did not create an unreviewed environmental question. A brief description of the change is included below:

**Change:** Revision of the Circulating Water System Chemical Composition and Use of DeposiTrol BL5323

Since Nine Mile Point Nuclear Station (NMPNS) Unit 2 uses the calcium rich alkaline waters of Lake Ontario as makeup water to the Circulating Water System (CWS), a scale inhibitor is required to prevent deposition of calcium carbonate scale on the condenser during normal operation. The current scale inhibitor, BetzDearborn



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Powerline 3450 is being discontinued and an alternative scale inhibitor is required. BetzDearborn DeposiTrol BL5323, a blend of a sulfonated copolymer and HEDP (hydroxyethylidene diphosphonic acid) was evaluated as an alternative scale inhibitor. Functionally, this product will prevent suspended solids from depositing on the condenser tube surfaces and cooling tower plastic fill material, in addition to preventing the deposition of calcium carbonate scale on the condenser tube surfaces.

The station's State Pollutant Discharge Elimination System (SPDES) Permit was modified on October 28, 1998 to allow for the use of BetzDearborn DeposiTrol BL5323. An environmental evaluation was performed for Safety Evaluation 98-027, and concluded no unreviewed environmental question resulted from the change.

Secondly, the Circulating Water System (CWS) chemical composition was revised to reflect actual chemical composition in the CWS. The Final Environmental Statement (FES) for Unit 2 estimated the cycles of concentration to be 2 to 2.5 times the actual lake concentrations. Historically, the CWS has been operated at cycles of concentration between 3 and 4. An environmental evaluation was performed as part of 10CFR50.59 Safety Evaluation 98-027, and concluded no unreviewed environmental question resulted from the change.

4. List all non-routine reports that were submitted during 1998 in accordance with Section 5.4.2 of the EPP.

During 1998, there were no non-routine reports were submitted to the Commission in accordance with Section 5.4.2 of the EPP.



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