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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 FURLER, T. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 BREZINSKI, R. Pennsylvania, Commonwealth of

SUBJECT: NPDES noncompliance notification: on 950328, PP&L overfilled underground storage tank which contains lubricating oil at SSES. PP&L in process of investigating cause of release. About 200 tons of affected gravel removed from tank vault.

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NOTES: 05000387

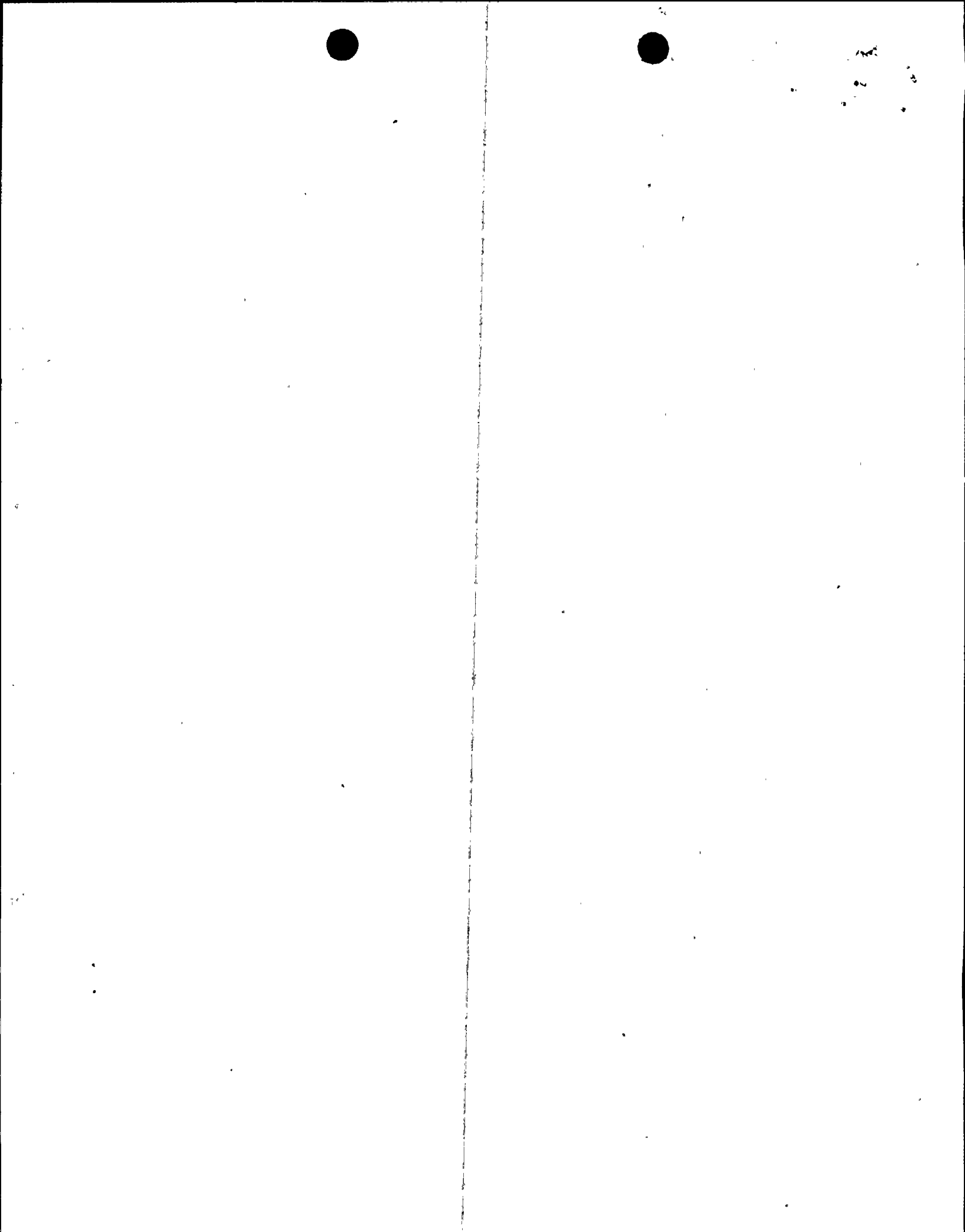
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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

April 13, 1995

Mr. Ronald Brezinski
Pennsylvania Department of Environmental Resources
Division of Storage Tanks
Second Floor
90 East Union Street
Wilkes-Barre, PA 18701

SUSQUEHANNA STEAM ELECTRIC STATION
FOLLOW-UP ON OVERFILL OF A REGULATED UST
CCN 741326 FILE R9-7
PLE- 18592

Dear Mr. Brezinski:

On March 28, PP&L overfilled an underground storage tank (UST) which contains lubricating oil at our Susquehanna Steam Electric Station (SSES). On the following day, I notified your agency of the release by telephone. This letter is a follow-up to that notification.

At approximately 2200 hours on March 28, 1995, PP&L Operations personnel drained the Unit 1 main turbine lube oil reservoir in order to support activities for a refueling outage on that unit. During this evolution, the oil is drained to the Unit 1 batch oil tank, which is a regulated storage tank. This tank is located in a concrete vault which is backfilled with gravel. The tank is equipped with a local high-level alarm; however, the alarm does not isolate the fill lines to the tank.

During this transfer, the alarm actuated. In spite of this, the tank was still overfilled. We initially thought that about 200 gallons of lubricating oil (GulfCrest 32) overflowed onto the gravel in the vault. We now estimate that the actual amount was about 400 gallons. The entire release was contained within the vault at all times. All of the oil was absorbed by the gravel.

Because the release was entirely contained and under PP&L's control, it was not at first considered to be reportable. At 0900 on March 29, day shift personnel reevaluated the determination of reportability. By 1145, based on our interpretation of 25 Pa. Code 245, we concluded that the release was not reportable, but felt it prudent to

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April 13, 1995

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CCN 741326 FILE R9-7
PLE- 18592
To: Mr. Ronald Brezinski

inform PaDER of the occurrence anyway. At 1345, Bill Ulicny called me back to inform me that this was indeed a reportable release.

Based on that information, in accordance with our agreement with Jim Siracuse, I called the Luzerne County Emergency Management Agency (LCEMA) and informed Mark Pavilitz of my discussion with PaDER. He understood that I was calling only to notify LCEMA of the release, that this was not an emergency, and that no action was required by LCEMA. The US Nuclear Regulatory Commission was also notified of the spill.

PP&L is in the process of investigating the cause of this release so that we can prevent a similar recurrence.

We have removed about 200 tons of the affected gravel from the tank vault and will recycle it as asphalt stock. About half of the gravel remains in the vault. We believe that the removal of this material will compromise the structural integrity and accessibility of the equipment within the vault. It has also become apparent to us that removal of the gravel is not a cost-effective way to collect the remaining product when we have another means of doing so, using the vault sump.

After the removal of the gravel, we pumped the contents of the vault sump into an oil separator. We continued to pump out the sump and separate the contents over the course of two days, until there was no longer a significant influx of oil to the sump. This indicates that most of the free product has been removed. However, the vault sump will be examined for the presence of oil at least once every 30 days, since the sump is our monitoring well for meeting the release detection requirements of 40 CFR 280. If oil is found in the sump, it will be collected and disposed of or recycled in accordance with regulations. We will then verify that the tank is not leaking. We anticipate that this practice will continue for the remainder of this tank's service life.

These steps, as described in the preceding two paragraphs, fulfill our corrective actions for the release and will ensure that any remaining product does not reach the environment. On May 1 or shortly afterward, we will replace the material that was removed with fresh gravel.

Upon reviewing our records for similar occurrences, we discovered another incident that occurred on October 12, 1994, while oil transfer operations were performed on the Unit 2 batch oil tank (registration # 40-10748-017). During the transfers, the lubricating oil flowed back through an isolation valve in the fill line and past the fill cap. (It appeared, during subsequent investigation, that the isolation valve was not fully closed and the fill cap was not fully tightened.) Approximately 50 gallons of oil leaked into the catchment basin of the tank. The oil was entirely contained in the concrete catchment basin and was cleaned up within a few days of its discovery.



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April 13, 1995

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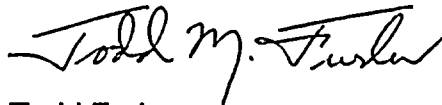
CCN 741326 FILE R9-7
PLE-18592
To: Mr. Ronald Brezinski

If you have any questions or comments about either of these events, please call either of the following persons for assistance:

Mr. Todd Furler, A9-3
PP&L
Two North Ninth St.
Allentown, PA 18101
(610) 774-7888

Mr. Tim Belles
Susquehanna SES
Effluents Management
PO Box 467
Berwick, PA 18603
(717) 542-3800

Sincerely,



Todd Furler
Project Engineer - Nuclear

Copy to:

Mr. Jim Siracuse, Luzerne County Emergency Management Agency

~~US-NRC Document Control Desk~~

US NRC Region I

Mr. C. Poslusny, NRC Project Manager

