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SUBJECT: Reports proposed changes, changes & additions completed & applications for renewal of NPDES permit & State Certification under requirements of Environ Protection Plan Section 3.2.

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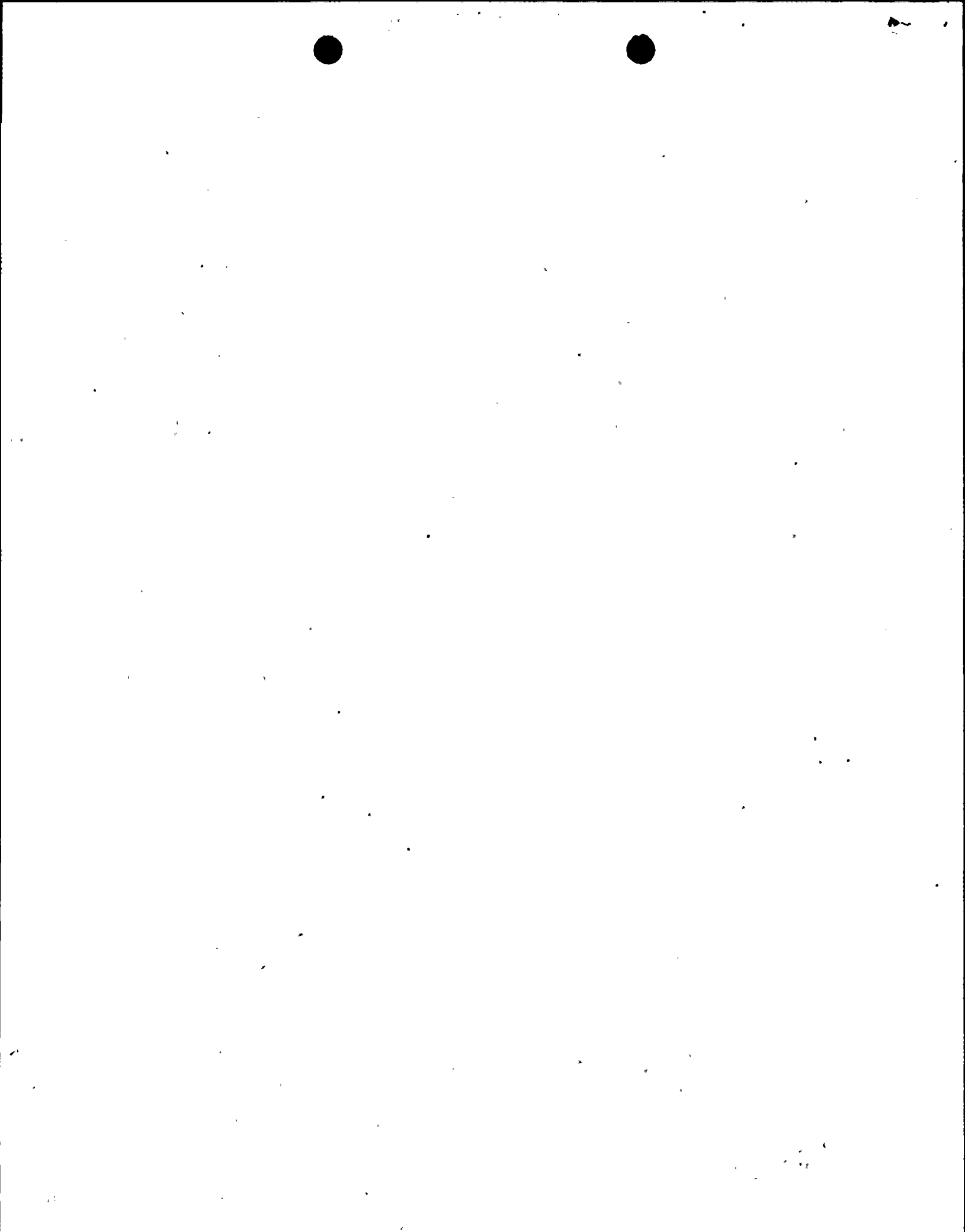
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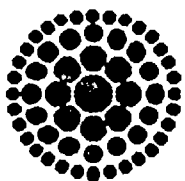
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# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302

April 8, 1997  
3F0497-30

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555-0001

Subject: Reports Required By The Environmental Protection Plan

Dear Sir:

Florida Power Corporation (FPC) is submitting this letter for the purpose of reporting proposed changes, changes and additions completed, and applications for renewal of the National Pollution Discharge Elimination System (NPDES) permit and State Certification under the requirements of the Environmental Protection Plan (EPP), Section 3.2. FPC has failed to provide the required reports in a timely manner since February, 1993.

## ENVIRONMENTAL PROTECTION PLAN PROVISIONS

Section 3.2 of the EPP establishes reporting requirements related to the NPDES permit and State Certification.

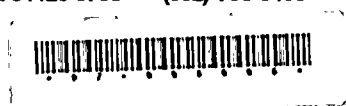
Section 3.2.1 of the EPP requires reporting of violations of the NPDES permit. No violations have occurred.

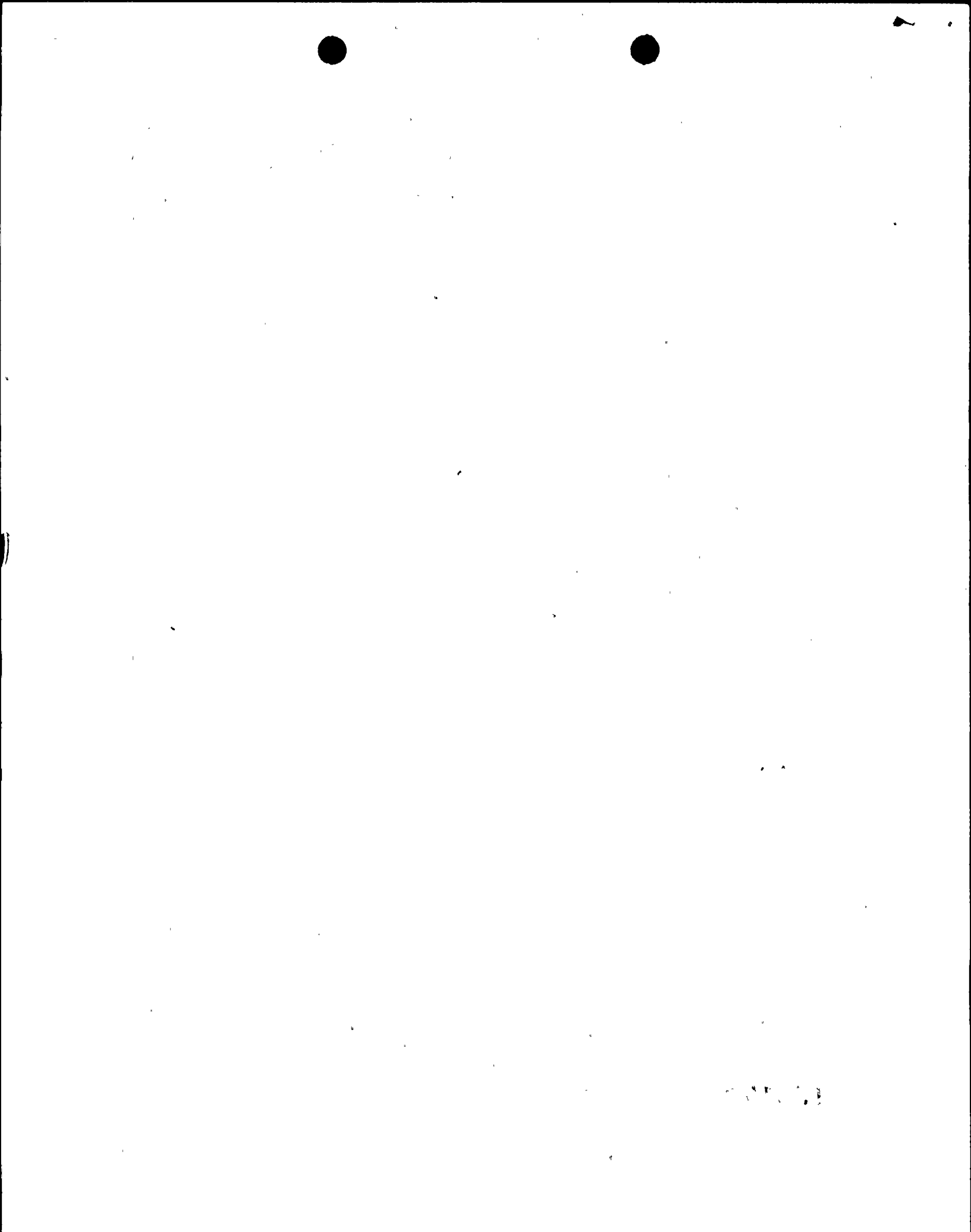
Section 3.2.2 of the EPP requires reporting of any Safe Drinking Water Act Section 316(a) or (b) studies and/or related documentation on the environmental impacts of entrainment and thermal effects. No new studies have been performed since the original studies in the 1980's.

Section 3.2.3 of the EPP requires reporting of changes and additions to the NPDES permit or the State 401 Certification, and appeals which are stayed. While there were no appeals, there have been changes and additions to the NPDES permit. These documents are now being submitted.

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Section 3.2.4 of the EPP requires reporting of proposed changes to the NPDES permit, and applications for renewal of the NPDES permit. These documents are now being submitted.

Section 4.0 of the EPP requires the reporting of significant events that could result in significant environmental impact. There have been no such significant events.

REASONS FOR FAILURE TO REPORT

The reason for the failure to submit these reports was the result of staffing and program changes. The Manager, Nuclear Licensing did not receive the NPDES changes since February, 1993 and thus failed to submit the required reports. This error was discovered during a scheduled audit performed as part of CR-3's Nuclear Quality Program.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The Environmental Services Department (ESD) has reviewed and collected the NPDES documentation on studies, proposed changes, changes and additions completed, applications for renewal, appeals, and violations since the last submittal to the NRC. These have been provided to the Manager, Nuclear Licensing and are submitted herewith to the NRC.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER REPORTING FAILURES

CR-3 staff is developing an internal procedure to formalize the EPP/NPDES reporting requirements to the NRC. As part of this plan, the ESD will include an instruction in the CR-3 Environmental Compliance Manual to forward all NPDES related documentation or permit modifications to the responsible party for reporting to the NRC.

Full compliance has been achieved with the submittal of these documents.

Sincerely,



David F. Kunsemiller  
Director, Nuclear Operations Site Support

DFK/SMG

Attachments

cc: Regional Administrator, Region II  
NRR Project Manager  
Senior Resident Inspector

U.S. Nuclear Regulatory Commission  
3F0497-30  
Listing of Attachments

Attached are the relevant documents summarized below; i.e., letters and documentation to and from the Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (DEP):

1. FPC letter to EPA - March 30, 1993 (application for renewal of NPDES permit for Crystal River Units 1, 2, and 3)
2. FPC letter to EPA - July 2, 1993 (FPC comments on draft NPDES permit)
3. FPC letter to EPA - July 7, 1993 (additional FPC comments on the draft NPDES permit)
4. FPC letter to EPA - August 3, 1993 (additional FPC comments on draft NPDES permit)
5. FPC letter to EPA - September 2, 1993 (additional FPC comments on draft NPDES permit)
6. EPA letter to FPC - September 30, 1993 (issuance of NPDES permit)
7. FPC letter to EPA - December 15, 1994 (FPC request for modification of NPDES permit)
8. EPA letter to FPC - April 24, 1995 (issuance of NPDES permit)
9. FPC letter to EPA - September 5, 1995 (additional information)
10. FPC letter to EPA - January 19, 1996 (additional information)
11. FPC letter to DEP - March 19, 1996 (additional information on Clam-Trol and Amertap)
12. FPC letter to DEP - October 16, 1996 (FPC request for authorization to use Clam-Trol)
13. FPC letter to DEP - November 1, 1996 (laboratory studies of total suspended solids and turbidity)
14. FPC letter to DEP - November 25, 1996 (FPC request to modify NPDES permit to use Clam-Trol, etc. at different ratios)
15. State of FL., DEP - February 10, 1997 (Notice of draft permit)
16. FPC letter to DEP - March 7, 1997 (comments on draft NPDES permit)