Dockets

APR 1 1980

Docket No. 50-335

MEMORANDUM FOR: Robert Reid, Chief
Operating Reactors Branch 4, DOR

FROM: George Lear, Chief
Environmental Specialists Branch, DSE

SUBJECT: PROPOSED CHANGES TO ENVIRONMENTAL TECHNICAL SPECIFICATIONS (ETS) FOR ST. LUCIE (TAC 11614)

PLANT NAME: St. Lucie
RESPONSIBLE BRANCHES: ORB-4, ESB
PROJECT MANAGER: P. Erickson
REVIEW STATUS: Complete

On April 12, 1979, Florida Power and Light Company (FP&L) submitted a request to delete certain water quality requirements from the Appendix B Environmental Technical Specifications for St. Lucie Unit 1. The licensee's only justification for deleting these requirements is that they are contained in the NPDES permit.

On September 7, 1979, Region IV of the U.S. Environmental Protection Agency issued for comment changes to the St. Lucie NPDES permit proposed by FP&L and requested NRC review. These proposed permit changes involve the same parameters proposed to be deleted from the ETS. The proposed permit changes would result in less restrictive requirements. The licensee provided EPA with an extensive environmental assessment of making the proposed changes.

In responding to EPA's request, we have reviewed the assessment which FP&L sent to EPA. At the same time we reviewed the portions of the NPDES permit which contain restrictions similar to those in the ETS. We found that we had no objections to the proposed changes to the permit. We found that we could rely on the NPDES permit for limiting those parameters which the licensee requested to be deleted from the ETS. On December 4, 1979, we sent a letter to the Chief, Water Enforcement Branch of Region IV-EPA, informing him that we did not object to the permit modifications and that we intend to rely on the NPDES permit conditions for limiting those parameters to be deleted from our ETS. On February 18, 1980 the permit was modified in accordance with the utility's request.

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On March 4, 1980, we telephoned EPA-Region IV and they indicated that they had no objections to our relying on the NPDES permit. We, therefore, are deleting the water quality parameters as requested by the licensee. As we will be relying on the NPDES permit, we have added to Section 6, Special Conditions, a requirement for reporting of violations and changes to the permit. We have also added a requirement for the reporting of unusual events.

The licensee's amendment request did not address water quality monitoring programs. We note that the ETS aquatic monitoring requirements are referred to in the NPDES permit as the EPA required program. We plan to discuss aquatic monitoring with EPA and the licensee to coordinate the transfer of these monitoring requirements to the NPDES permit. When the requirement to rely on the ETS monitoring program is removed, we will then completely revise the ETS to rely on the NPDES permit for specifying aquatic monitoring.

Enclosure 1 contains an Environmental Impact Appraisal for the license amendment. Enclosure 2 contains the new pages of the ETS with marginal bars indicating the changes effected by this action.

Original signed by George Lear

George Lear, Chief
Environmental Specialists Branch
Division of Site Safety and
Environmental Analysis

Enclosures:
1. EIA
2. New pages of ETS

cc: M. Ernst
W. Gammill
P. Erickson
R. Samworth
T. Cain
B. Grimes
D. Crutchfield
S. Treby

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