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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 CONWAY, W.F. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards 881202 ltr to EPA requesting NPDES permit mod re hydrazine discharges.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

DECEMBER 19 1988

L-88-534

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

Gentlemen:

Re: St. Lucie Unit Nos. 1 and 2
Docket Nos. 50-335 and 50-389
NPDES Permit Modification

In accordance with Section 3.2.4 of the St. Lucie Units 1 & 2 Environmental Protection Plans, attached is a copy of a letter to the U.S. Environmental Protection Agency requesting a modification to the St. Lucie Plant NPDES permit. The specific modification is discussed in the attached document.

Very truly yours,

W. F. Conway
W. F. Conway
Senior Vice President - Nuclear

WFC/MSD/cm

Attachment

cc: Malcolm L. Ernst, Acting Regional Administrator, Region II,
USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

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RETURN RECEIPT REQUESTED

FPL

December 2, 1988

Mr. Bruce Barrett, Director
Water Management Division
Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

RE: Request for Permit Modification
NPDES Permit No. FL0002208
St. Lucie Power Plant

Dear Mr. Barrett:

Florida Power & Light Company, (FPL) hereby requests a modification to the above-referenced NPDES permit. This request is being made in order to include the release of hydrazine as a "federally permitted release," consistent with provisions set forth in 42 U.S.C. 9601(10).

High purity water is generated at the St. Lucie Plant by a water treatment plant by way of carbon filtration and anion and cation exchange demineralization. Much of this high quality water is routed to the secondary system and steam generators as makeup for the water/steam cycle. Ammonium hydroxide is added for pH control and hydrazine is added for oxygen removal. Undesirable contaminants such as chlorides from condenser leaks can contaminate the steam generator water. Strict operating specifications require that suspended and dissolved solids be maintained at very low levels, therefore, to keep the contaminants at these low levels, a continuous steam generator blowdown is required. This blowdown is either recovered or routed to the discharge canal. The concentration of hydrazine in these discharges normally range from 25 ppb to 2ppm.

During overhauls and/or refueling outages the steam generators, feedwater systems, and/or condensers may be placed in a static mode where the internal metal surfaces of these components must be protected from corrosion. The typical method used is to fill the system with a hydrazine/ammonia/demineralized water solution. This solution must then be drained and discharged to the plant's discharge canal. FPL is requesting that these discharges, which normally occur approximately every eighteen months per unit, be included in the NPDES permit for the St. Lucie Power Plant.

FPL has included results of a modeling study which was performed by KBN Engineering and Applied Sciences, Inc. which indicates the "worst case" concentrations of hydrazine which could be expected during a discharge. In addition, a toxicological review prepared by FPL is included which discusses the toxicological impact of these hydrazine releases.

FPL believes that this information adequately documents the anticipated impact of these hydrazine discharges. We believe that there will be no significant environmental impact from these discharges. In order to accurately determine the actual concentrations of hydrazine, FPL proposes to monitor for hydrazine at the compliance point in the discharge canal during a release associated with an overhaul and/or refueling outage. The next one of these hydrazine releases at St. Lucie is anticipated in January, 1989. The data collected by FPL will be reported to the EPA on the Discharge Monitoring Report submitted the month following the release.

Please feel free to contact Winifred Perkins at (407) 640-2023 if you have any questions concerning this request for permit modification.

Sincerely,



T. R. Fair
Manager
Environmental Permitting and Programs

TRF:WGP:jm

Enclosure

cc: Charles Kaplan - EPA (w/encl.)
Yvonne Martin - EPA (w/encl.)
Vivek Kamath - DER (w/encl.)