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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 SAGER, D.A. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards util 940822 & 25 ltrs, requesting mods to NPDES permit to delete OSN 006A & 008 outfalls & clarify & designate routing & exact location for OSN 006C.

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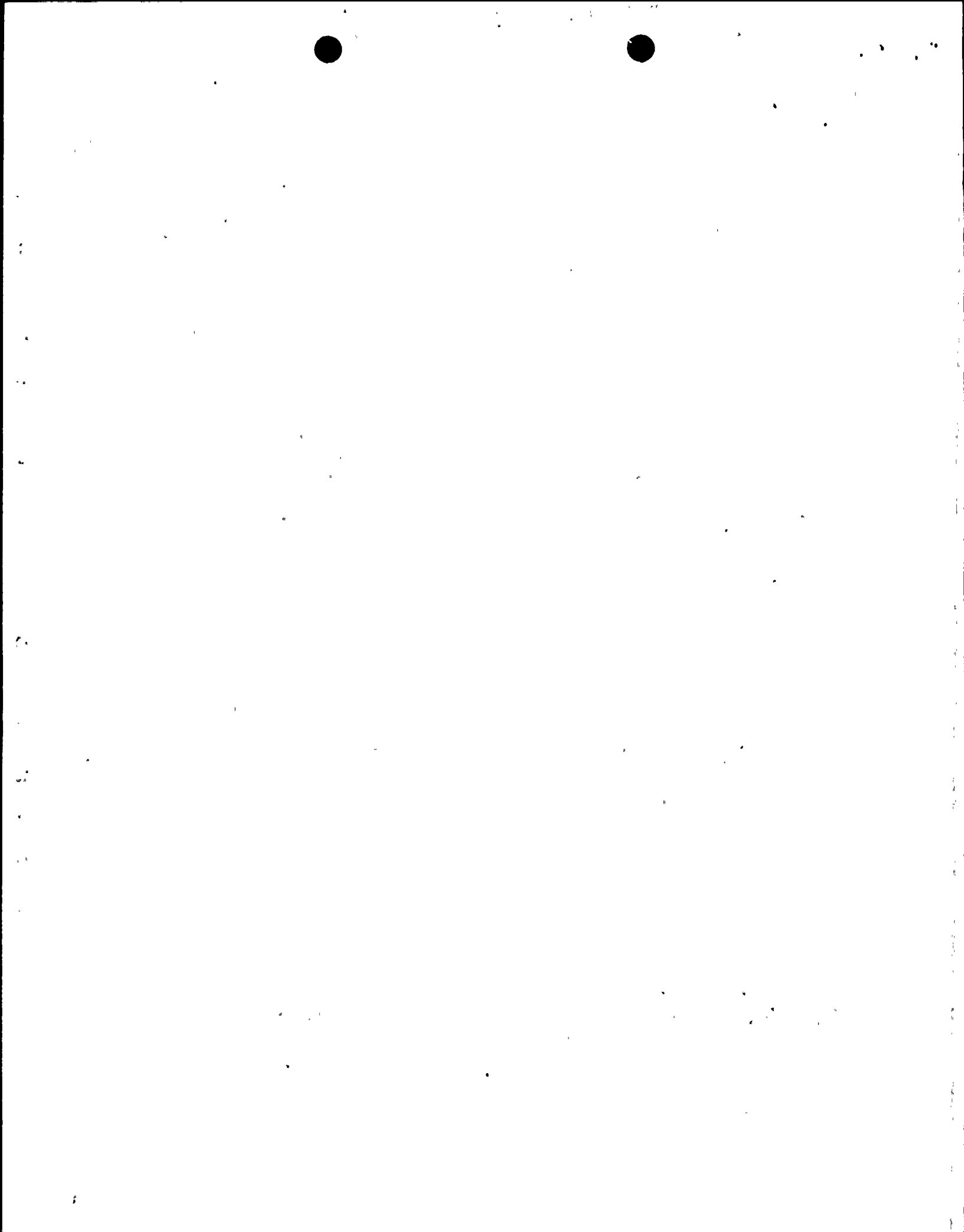
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P.O. Box 128, Ft. Pierce, FL 34954-0128

August 31, 1994

L-94-228
EPP 3.2.4

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

Re: St. Lucie Units 1 & 2
Docket Nos. 50-335 & 50-389
Environmental Protection Plan Report
NPDES Permit Modification Requests

Attached are copies of FPL Letter dated August 22, 1994 and FPL Letter dated August 25, 1994, which request modifications to the St. Lucie NPDES Permit. These copies are being submitted pursuant to the requirements of Section 3.2.4 of the St. Lucie Unit 2 Environmental Protection Plan.

Should there be any questions on this information, please contact us.

Very truly yours,

D. A. Sager
Vice President
St. Lucie Plant

DAS/CDW/kw

Attachment

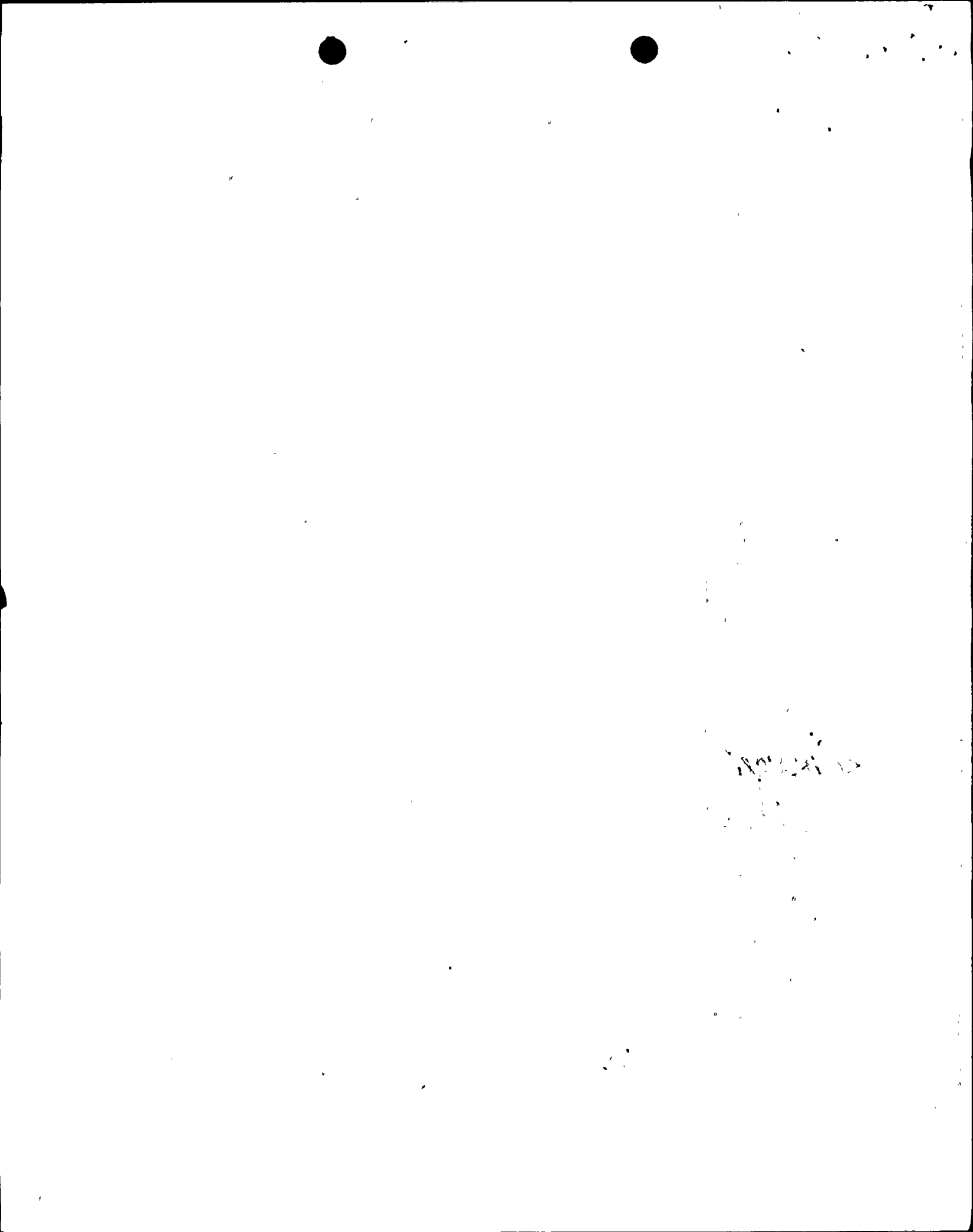
cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

DAS/PSL #1197-94

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PDR ADDCK 05000335
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COPI





Florida Power & Light Company, P.O. Box 088801, North Palm Beach, FL 33408-8801

Certified Mail
Return Receipt Requested
P 253 325 158

August 22, 1994

Ms. Tammy Moore
Water Permits and Enforcement Branch
U. S. Environmental Protection Agency
345 Courtland Street , N. E.
Atlanta, Georgia 30365

**RE: Florida Power and Light Company
St. Lucie Power Plant
NPDES Permit Number FL0002208
Request For Minor Permit Modification**

Dear Ms. Moore:

Below please find Florida Power & Light Company's (FPL) request for a minor modification to the St. Lucie Plant NPDES Permit No. FL0002208. Ideally, FPL would like to have this modification in place prior to delegation of the NPDES program to the State of Florida which should occur in early 1995.

Deletion of OSN's 006A and 008

On Page I - 9, Part I. A. 6. of the current NPDES Permit for the St. Lucie Plant, OSN 006A is an outfall for industrial related stormwater to the plant's intake canal from the paint house area, while OSN 008 is an outfall for industrial related stormwater from the land utilization building area to Big Mud Creek. Between the time the permit was issued on September 30, 1993, and the date it became effective, January 1, 1994, changes were made to the site which eliminated these outfalls to surface waters. Therefore, in accordance with 40 CFR 122.63 (e) (2), FPL requests that these outfalls be deleted from the current NPDES permit.

If you have any questions or need additional information on this matter, please contact Ron Hix at (407) 625-7605.

Sincerely,

A handwritten signature in cursive script that reads "Larry L. Leskovjan".

Larry L. Leskovjan
Manager
Environmental Affairs



Airborne Express

August 25, 1994 .

Ms. Tammy Moore
Water Permits and Enforcement Branch
U. S. Environmental Protection Agency
345 Courtland Street , N. E.
Atlanta, Georgia 30365

**RE: Florida Power and Light Company
St. Lucie Power Plant
NPDES Permit Number FL0002208
Request For Permit Modification**

Dear Ms. Moore:

Below please find Florida Power & Light Company's (FPL) request for a permit modification to the St. Lucie Plant NPDES Permit No. FL0002208.

Over the previous ten years, FPL has had to notify EPA during virtually every summer wet season of at least one by-pass of water from the South Basin to the plant's intake canal (See Figure 1 for location). These by-passes were due to the large amount of stormwater which flows from the east parking area of Unit 2 during the wet summer season and enters the South and Southeast Basins. These basins were designed to handle some of the plant's low volume waste effluent streams (equipment area stormwater, neutralization basin effluent and Unit #2 domestic wastewater treatment plant effluent), not this relatively large amount of stormwater. In order to avoid these by-passes to the largest extent possible, FPL has allowed the southern portion of the east parking lot to flood; often under several feet of water. With several major outages planned in the near future (November 1994) FPL needs the have this additional parking space available for use.

On May 16, 1994, FPL received from the Florida Department of Environmental Protection, permission to construct a system which would segregate the stormwater, which originates from the parking areas, from the low volume waste that discharges into the South and Southeast Basins, capture it, and route it, via gravity flow, to a retention swale on the east side of State Road A1A (See Attachment 1). Here it will be pre-treated in a South Florida Water Management District approved retention area (See Figures 2A, 2B, and 2C), allowed to flow through a 3 inch "bleeder" pipe into Mangrove Impoundment 8E and eventually, discharged into the plant's intake canal (See Figure 2 for proposed location of outfall).

Ms. Moore
August 25, 1994
Page 2

Clarification and Designation of Non-Industrial Activity Stormwater Discharge Point OSN 006C

On Page I - 11, Part I. A. 8. of the current NPDES Permit for the St. Lucie Plant, OSN 006C is an outfall for non-industrial related stormwater to the plant's intake canal. Part I. A. 8. a. reads,

"The discharge of uncontaminated (i.e., not contaminated by process and/or product materials) stormwater to the intake canal is permitted without limitations or monitoring requirements."

In Form 2F of the most recent permit renewal application, FPL applied for a non-industrial activity outfall without specifying a particular discharge point. This was done because FPL did not know exactly where this discharge would be located at that time and intended to file an amendment to the permit application before the final NPDES permit was issued. However, the final NPDES permit was issued on September 1, 1993, before FPL had made a final decision on the actual discharge location. At this time, FPL is seeking to modify the final NPDES permit to designate the routing and exact location for OSN 006C.

The discharge point to be used for this project (OSN 006C) currently releases water which was pumped into the mangrove area from the intake canal to provide flushing for the mangroves and to help in mosquito control. After a period of time, this water is released back to the intake canal. This flushing is controlled by the local Mosquito Control District. By replacing much of the salt water that is pumped from the intake canal into the mangrove impoundment, as is presently the case, with "fresh" stormwater, a more natural system is emulated resulting in less salt buildup in this area and therefore, potentially more healthy mangrove trees. Vitality of the mangroves is important not only for ecological reasons, but these mangroves are currently part of the plant's NRC-approved Flood Protection Plan.

The discharge charge point currently in use for this mangrove flushing procedure was exempted from permitting in a letter from EPA that was issued in 1989. This exemption was continued in the recently renewed NPDES permit which became effective on January 1, 1994. FPL requests that this point be considered non-industrial activity stormwater outfall - OSN 006C.

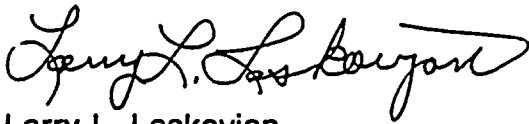
FPL does not believe that a permitted outfall into the mangrove area is necessary as this impoundment area should not be considered "waters of the United States" according to the definition found in 40 CFR 122.2. The main rationale for not considering this impoundment as waters of the United States is that it is isolated (bounded by the intake canal on the south, S.R. A1A on the west, the discharge canal on the north, and a berm on the east side of the impoundment). The only connection of this impoundment with any surface water is through the proposed outfall 006C to the intake canal which is also not waters of the United States.

Ms. Moore
August 25, 1994
Page 3

FPL respectfully requests that this relatively simple modification be made as soon as possible so the final stages of the project on the west side of S. R. A1A can be drained and the final project completed prior to the refueling outage that is planned for November 1994.

If you have any questions or need additional information on this matter, please contact Ron Hix at (407) 625-7605.

Sincerely,



Larry L. Leskovjan
Manager
Environmental Affairs

ATTACHMENT 1

Florida Department of

Environmental Protection



Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell

RECEIVED

May 16, 1994

MAY 19 1994

Mr. Jim L. Brawner
Florida Power & Light Company
Post Office Box 088801
North Palm Beach, Florida 33408-8801

ENVIRONMENTAL AFFAIRS

Re: St. Lucie No. 2, PA 74-02 - Stormwater Project

Dear Mr. Brawner:

The Department of Environmental Protection hereby approves the Storm Water improvement Project as submitted on March 18, 1994, with the following provisos:

1. Silt screens, hay bales or other such sediment control measures shall be utilized during construction. The selected sediment control measures shall be installed landward of all protected wetlands. All areas shall be stabilized and vegetated (seeded/sodded) immediately after construction to prevent erosion into the wetlands and upland buffer zones.
2. Prior to the commencement of construction, the perimeter of the protected wetlands and buffer zones shall be staked and roped to prevent encroachment into the wetlands. The permittee shall notify the Department's environmental compliance staff in writing upon completion of roping and staking and schedule an inspection of this work. The roping and staking shall be subject to Department staff approval. The permittee shall modify the staking and roping if Department staff determines it is insufficient or is not in conformance with the intent of this permit. Staking and roping shall remain in place until all adjacent construction activities are complete.
3. The Department reserves the right to require remedial measures to be taken by the permittee if wetland and/or upland monitoring or other information demonstrates that adverse impacts to protected, conserved, incorporated or mitigated wetlands or uplands have occurred due to project related activities. The Department reserves the right to require that additional water quality treatment methods be incorporated into the drainage system if such measures are shown to be necessary.

page 2

4. If the project design is changed as a result of other agency requirements, a Surface Water Management permit modification may be required. The permittee shall notify Department staff of design changes required by other agencies for a determination of any necessary permit modifications.
5. The permittee shall prosecute the work authorized in a manner so as to minimize any adverse impact of the works on fish, wildlife, natural environmental values, and water quality. The permittee shall institute necessary measures during the construction period, including full compaction of any fill material placed around newly installed structures, to reduce erosion, turbidity, nutrient loading and sedimentation in the receiving wetlands.
6. Discharges during construction and development shall be made only through the facilities authorized by the conditions of certification. No parking lot construction shall commence on-site until completion of permitted discharge structure and detention areas.
7. The permittee shall hold and save the Department harmless from any and all damages, claims, or liabilities which may arise by reason of the construction, operation, maintenance or use of any facility authorized by the permit.
8. This permit is issued based on the applicant's submitted information which reasonably demonstrates that adverse off-site water resource related impacts will not be caused by the completed permit activity. It is also the responsibility of the permittee to insure that adverse off-site water resource related impacts do not occur during construction.
9. Operation of the Surface Water Management System shall be the responsibility of the permittee. Prior to transfer of title for any portion of the project to a third party, modification of the permit will be required.
10. Prior to the commencement of construction of future phases, paving, grading, and drainage plans shall be submitted to the Department for review and approval.
11. The permittee shall not refuse immediate entry or access to any authorized representative of the Department who requests entry for purposes of inspection and presents appropriate credentials.

page 3

12. Discharge facilities:
Weir, 91 feet long, crest elevation at 5.5 NGVD.
13. The Department reserves the right to require that additional water quality treatment methods be incorporated into the drainage system if such measures are shown to be necessary.
14. Facilities other than those stated herein shall not be constructed without an approved modification of the conditions.
15. A benchmark shall be provided in the vicinity of the control structure and a description provided to the Department when certifying construction completion of the drainage facilities.
16. Within 60 days of issuance of this approval, the Department shall be notified by the permittee or authorized agent (via South Florida Water Management District Form 0960 or equivalent) of the actual or anticipated construction start date and the expected completion date/duration.
17. When the duration of construction exceeds one year, construction status reports shall be submitted to the Department on an annual basis (via South Florida Water Management District Form 0961 or equivalent) beginning one year after the initial commencement of construction date.
18. Within 30 days after completion of construction of the Surface Water Management System, the permittee or authorized agent shall notify the Department of that completion date and submit certification by a Florida Registered Professional Engineer that all facilities have been constructed in accordance with the design approved by the Department (via South Florida Water Management District Form 0881 Construction Completion/Construction Certification or equivalent). Such certification may consist of wording in Paragraph 10.1 "Construction Completion Certification" of the current basis of review for Surface Water Management Permit applications within the South Florida Water Management District. If the certification language used is different from the suggested language, a set of record drawings consisting of elevations, locations and dimensions of components of the Surface Water Management System shall also be submitted.

page 4

Should you have any questions, please call me at (904)
487-0472.

Sincerely,

Hamilton S. Owen
Hamilton S. Owen, P.E.
Administrator, Siting
Coordination Office

cc: Jackie Kelly
Greg Coffelt
W. J. Barrow

ST. LUCIE PLANT STORM WATER MANAGEMENT IMPROVEMENTS

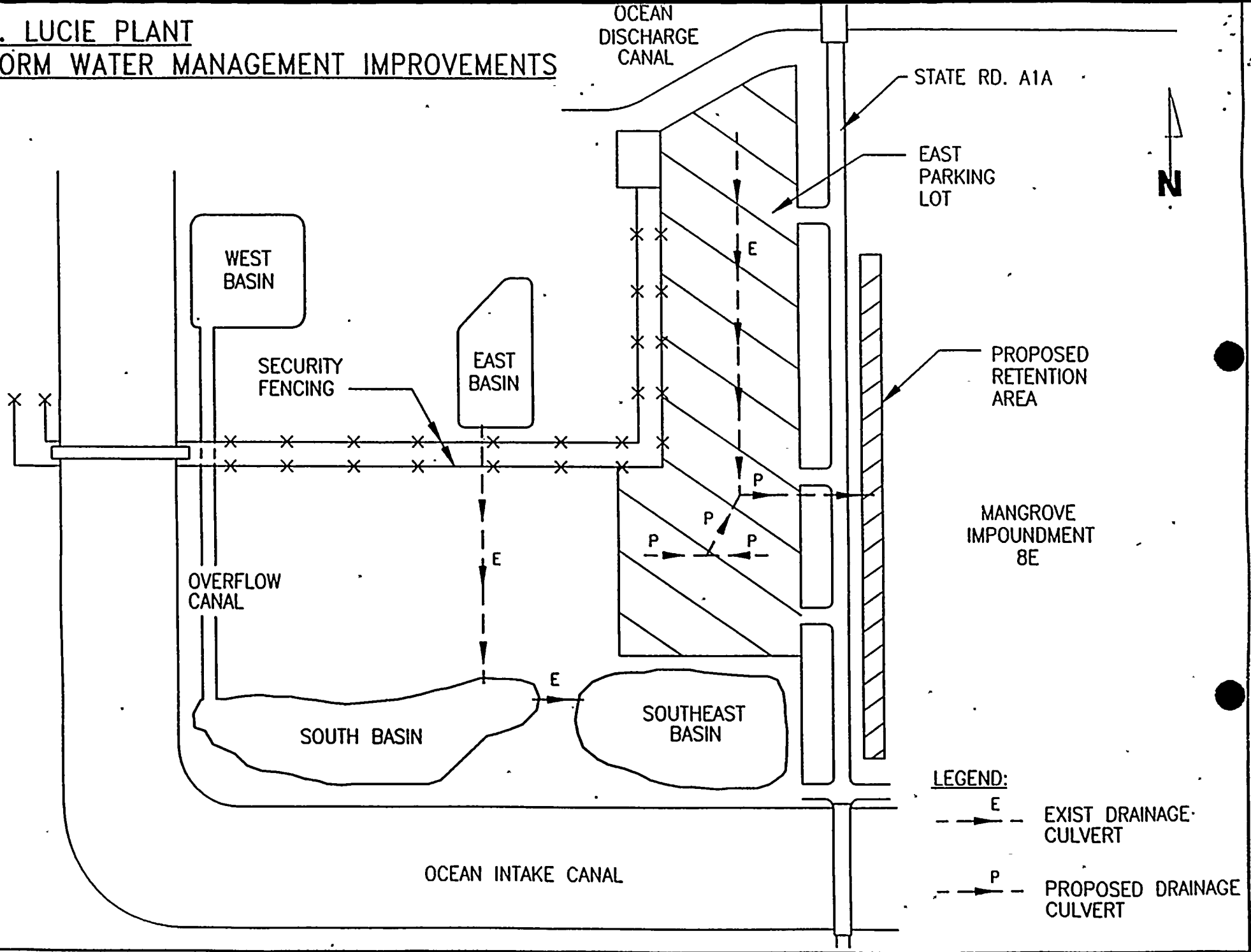
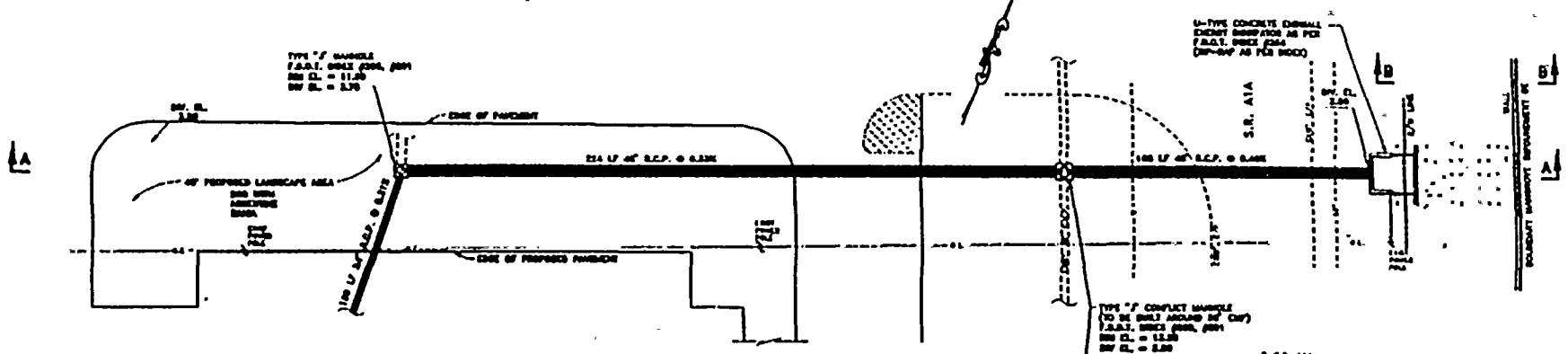


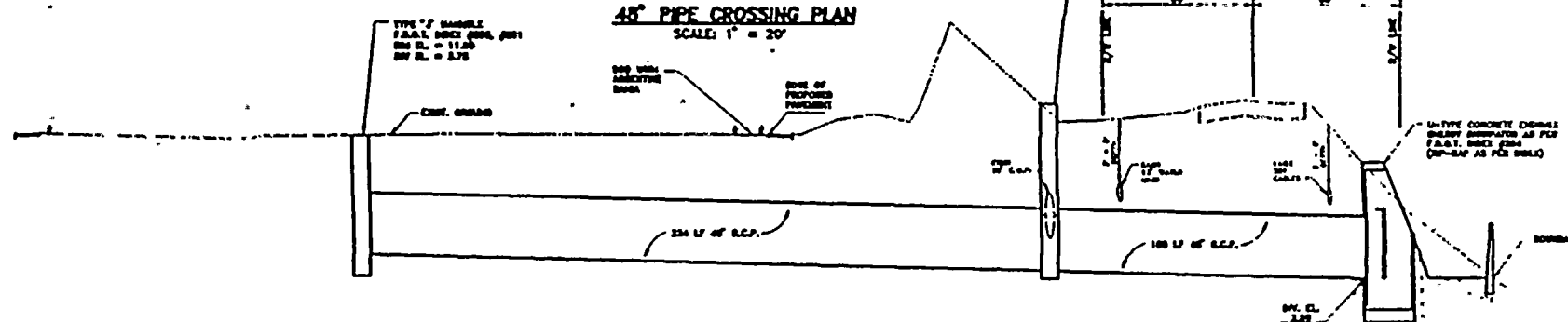
FIGURE 1

FIGURE 2A

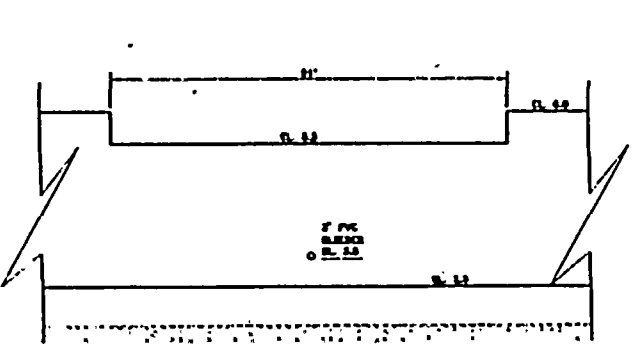
PROJECT NO.
1671



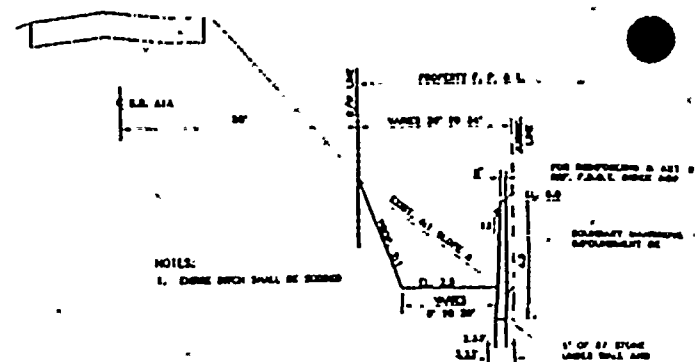
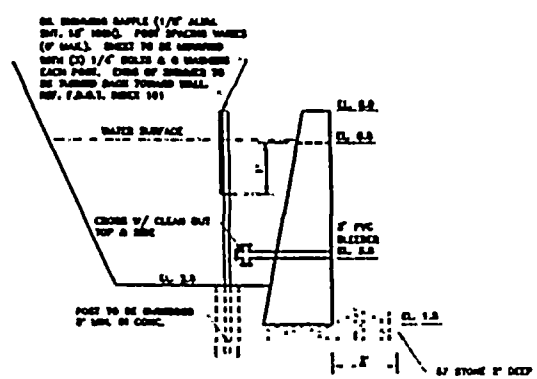
45° PIPE CROSSING PLAN
SCALE: 1" = 20'



SECTION A-A
SCALE: 1" = 20' HORIZ.
1" = 4' VERT.



WEIR DETAIL
N.T.S.



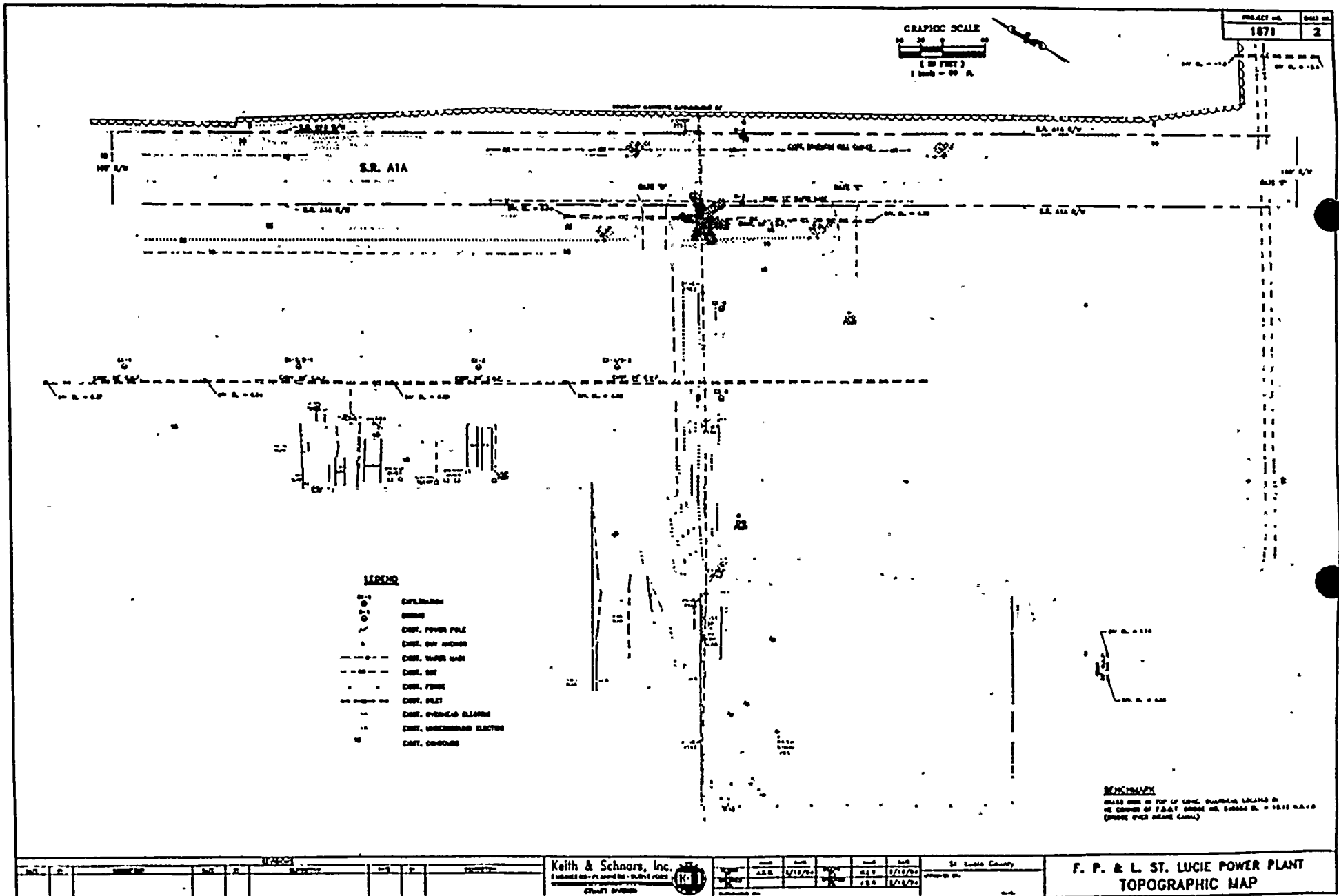
SECTION B-B
N.T.S.

NOTES:
1. DIMS WHICH SHALL BE SHOWN

<p>Keith & Schnars, Inc. LANDSLIDE PLANES SURVEYORS PLANT ENGINEERS</p>										<p>St Lucie County approved by</p>		<p>F. P. & L. ST. LUCIE POWER PLANT MISCELLANEOUS DETAILS</p>	
DATE	BY	CHECKED	DATE	BY	CHECKED	DATE	BY	DATE	BY	DATE	BY	DATE	BY
			5/15/74			5/15/74							

ITEM III-1

FIGURE 2B

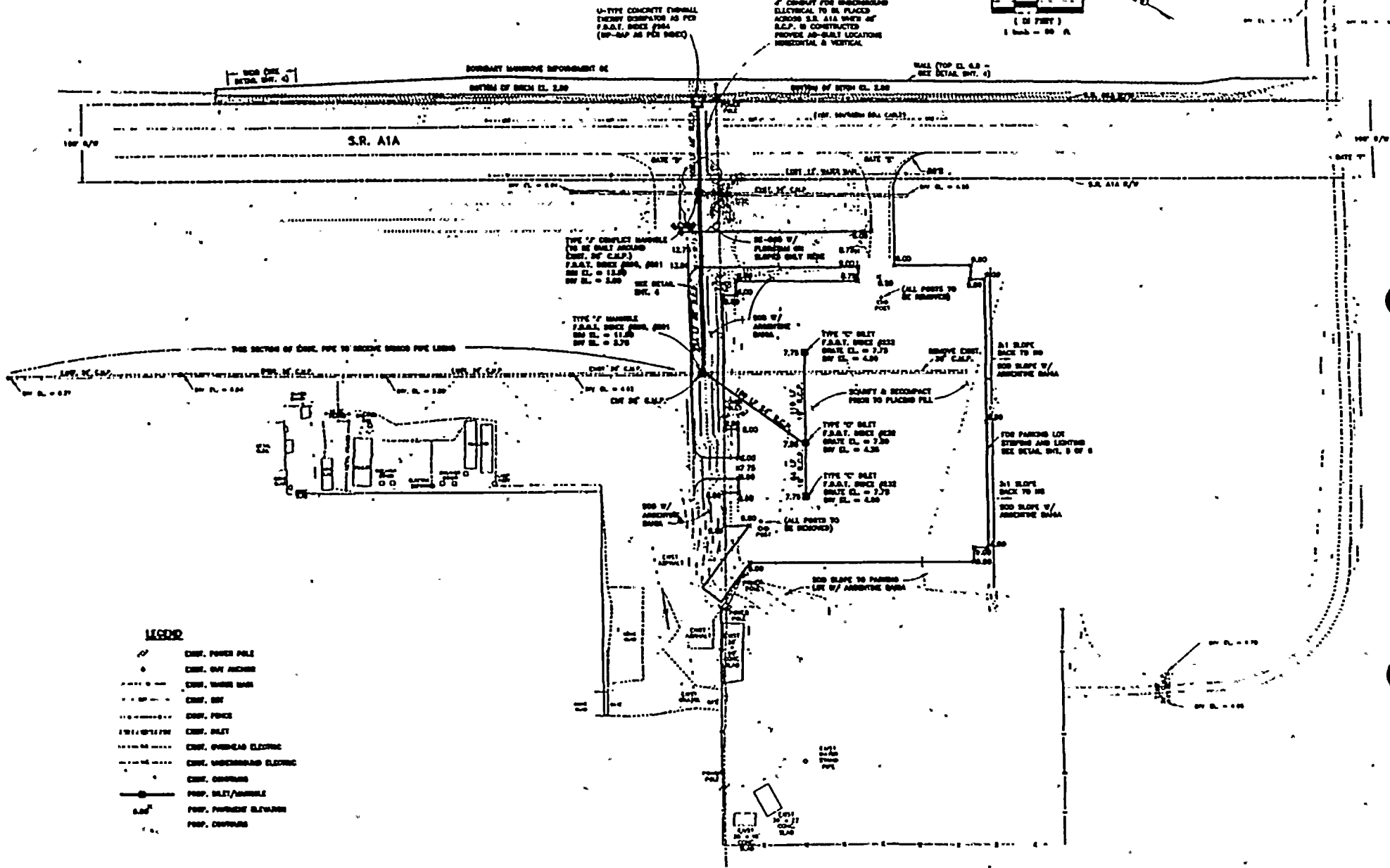
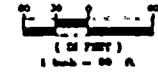


ITEM III - 1

FIGURE 2C

PROJECT NO. 1671
SHEET NO. 3

GRAPHIC SCALE

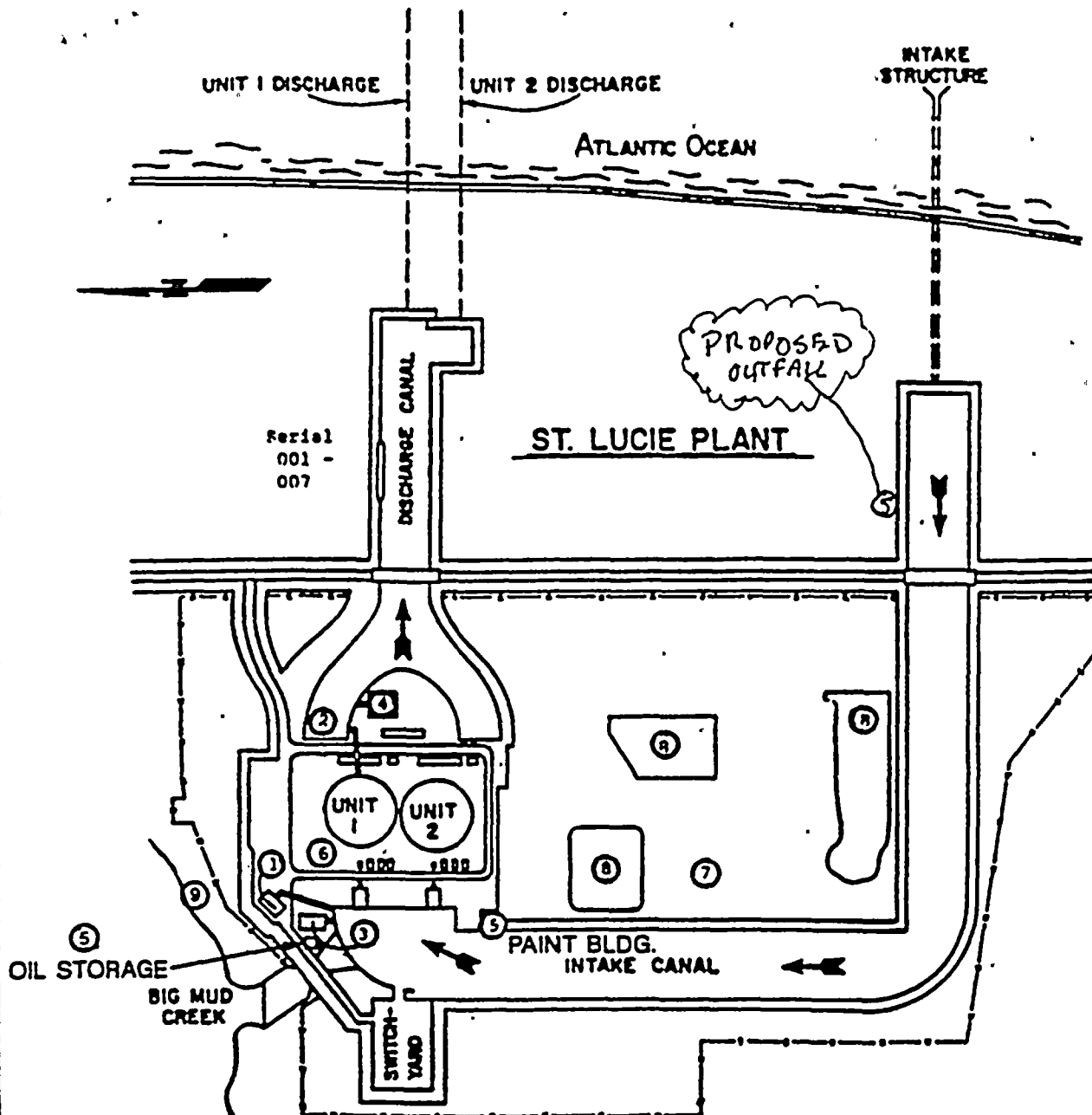


- LEGEND**
- EXIST. POWER POLE
 - EXIST. GUY ANCHOR
 - EXIST. UNDER DRAIN
 - EXIST. SW
 - EXIST. FENCE
 - EXIST. BUILT
 - EXIST. OVERHEAD ELECTRIC
 - EXIST. UNDERGROUND ELECTRIC
 - EXIST. CONDUIT
 - PROP. BUILT/MANHOLE
 - PROP. PAVEMENT ELEVATION
 - PROP. CONDUIT

Keith & Schnors, Inc. ENGINEERS - PLANNERS - SURVEYORS STUART DIVISION					DATE: 5/15/04 DRAWN BY: H.L.L. CHECKED BY: J.R.R. DATE: 5/15/04	St. Lucie County APPROVED BY:	F. P. & L. ST. LUCIE POWER PLANT PARKING LOT DRAINAGE PLAN
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ITEM III-1

FIGURE 3



Legend

- | | |
|--|--|
| 1) Low Volume Waste (Went. Basin)
Serial #002 | 5) Non-equipment Area Stormwater
Drains Serial #006 |
| 2) Radwaste System
Serial #003 | 6) Hazardous Waste Satellite
Accumulation Area |
| 3) Unit #1 Sewage Treatment Plant
Serial #004 | 7) Hazardous Waste 90-day
Accumulation Area |
| 4) Steam Generator Blowdown
Serial #005 | 8) Retting Basin |
| | 9) Land Utilization Maintenance
and Storage Area Serial #008. |



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