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AUTH. NAME AUTHOR AFFILIATION
 BROOKS, R.H. Tennessee Valley Authority
 RECIP. NAME RECIPIENT AFFILIATION
 Alabama, State of

SUBJECT: Followup to NPDES noncompliance notification re repair of sedimentation pond.

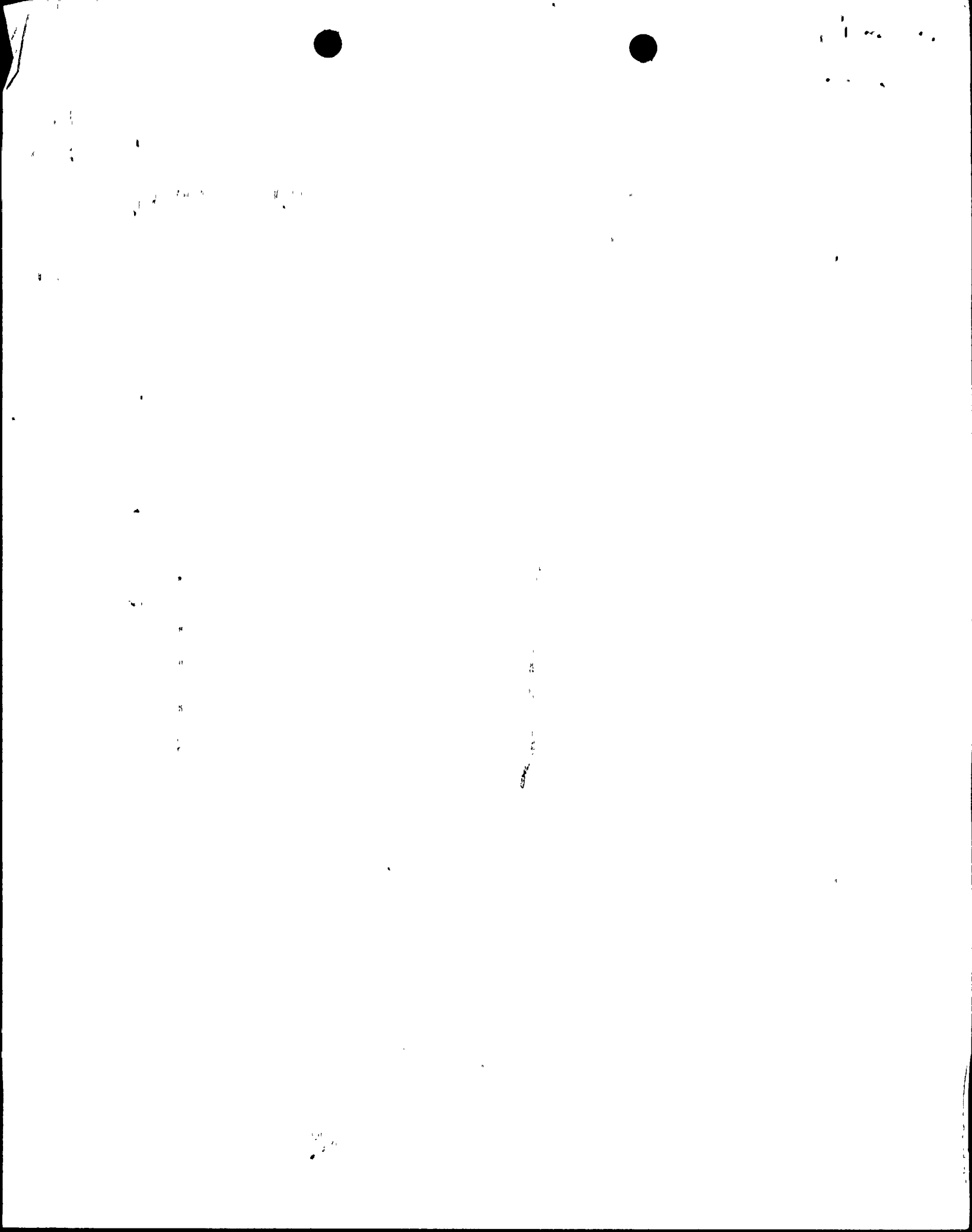
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TENNESSEE VALLEY AUTHORITY

MAY 13 1988

Mr. Charles Horn, Director
Water Division
Alabama Department of Environmental
Management
1751 Federal Drive
Montgomery, Alabama 36130

Attention: Ms. Treena Piznar

Dear Mr. Horn:

BROWNS FERRY NUCLEAR PLANT (BFN) - NPDES PERMIT NO. ALO022080 -
SEDIMENTATION POND - DISCHARGE SERIAL NO. 102

This is a follow up to my February 24 and March 25 letters to you regarding the repair of the sedimentation pond at BFN. This is our report on how the sedimentation pond was originally constructed, the extent of the repairs, and the results of the testing to determine the success of the repairs.

The pond was constructed around 1970, as part of a two pond system for treating metal cleaning wastes. Concentrated wastes were initially pumped to a lined pond, and then subsequently pumped to the sedimentation pond where they were diluted with river water prior to discharge. After BFN went into operation in 1974, wastewaters from the water treatment plant were also routed to the sedimentation pond. These wastes originated from the regeneration of the resin beds and filter backwash. The pond received this type of waste until March 1987, when the water treatment facility was removed from service. Since that time, a mobile water treatment facility (Ecolochem Inc.) has been providing demineralized water for BFN. The waste from this facility consists of filter backwash which contains alum, and is currently being routed to the lined pond while the sedimentation pond is out of service.

The sedimentation pond was built as a nonpermanent facility with a clay layer approximately two feet thick. The quality of the construction material was poor. The current repair work started on December 21, and concluded on February 10. During the excavation, it became apparent that the material used to originally construct the dike was not properly engineered after numerous stumps, rocks, and pipes were discovered in the dike. An area was excavated approximately 12 feet wide and 8 to 10 feet

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MAY 13 1988

Mr. Charles Horn

below the bottom of the pond. At this depth, we were able to identify suitable material to serve as a base for the fill that was placed in the excavated area. In addition, the new repair was tied into the area repaired in 1985. The 1985 repair work to the dike was done in a manner similar to the most recent work. The excavated area was backfilled with clay having a compaction of greater than 98 percent of the maximum Proctor density.

In an effort to ensure integrity of the latest construction repair, on March 18 the pond was filled to a depth of 12 inches with river water. On March 21, seepage was observed in the switchyard drainage ditch on the southwest side of the sedimentation pond. Therefore, the pond has not been placed back into service, and will not be used until further repairs can be undertaken.

Because of the problems experienced with this pond, BFN intends to install a synthetic liner. We have initiated the design process, and plan to submit an engineering report to your office by July 29 for your review and approval. Until the pond is retested, it will remain out of service. Wastewater will continue to be routed to the lined pond and not discharged.

If you or your staff have any questions on this matter, please have them contact Madonna E. Martin at (615) 632-6695 in Knoxville.

Sincerely,

ORIGINAL SIGNED BY
RALPH H. BROOKS

Ralph H. Brooks, Director
Environmental Quality

cc: Mr. K. P. Barr, Acting Assistant Director
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Continued on page 3

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Mr. Charles Horn

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

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