

Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

G B Slade
General Manager


November 26, 1991

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - NON RADIOLOGICAL
NPDES PERMIT VIOLATION REPORT - MAY THROUGH OCTOBER 1991

Section 3.2 of the Palisades Environmental Protection Plan (Non-Radiological) entitled, "Reporting Related to NPDES Permits and State Certifications," states that copies of reports to the State of Michigan indicating violations of NPDES permits shall be sent to the NRC. Our April 17, 1985 letter, to the NRC, states that we will comply with Sections 3.2 and 5.4.2 of Appendix B of the Palisades Technical Specifications, by submitting all NPDES permit violations and reports of Oil, Salt or Polluting Material loss on a semi-annual basis within 30 days from April 30 and October 31.

During the period from May 1991 through October 1991, no NPDES State notifications were required. Two reports of Oil, Salt or Polluting Material loss were made and are included in the attached information. Neither of the two spills resulted in any polluting material reaching an outfall. The attached information also provides a short summary of our activities regarding zebra mussel control and a summary of the latest NPDES permit revisions for the Palisades Plant.


Gerald B Slade
General Manager

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachment

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A CMS ENERGY COMPANY

Attachment

Consumers Power Company
Palisades Plant
Docket 50-255

NON-RADIOLOGICAL NPDES PERMIT VIOLATION REPORT
MAY THROUGH OCTOBER 1991

November 26, 1991

9 Pages

NON-RADIOLOGICAL NPDES PERMIT VIOLATION REPORT
MAY THROUGH OCTOBER 1991

During the period of May 1, 1991 through October 31, 1991 there were no NPDES violations reported to the Michigan Department of Natural Resources (MDNR).

In the same period two reports of Oil, Salt or Polluting Material loss were made. The first report notified the MDNR of a July 10, 1991 loss of approximately 200 gallons of liquid sewage from the plant septic system to a storm drain leading to an outfall. During transfer of sewage from holding tanks at the North end of the plant site, a cracked sewer clean-out fitting failed resulting in the sewage loss. The sewage flowed across a parking lot and into the storm drain system. The discharge end of the storm drain system was inspected for evidence of sewage discharged and there was no indication of any sewage present. This event was reported to the MDNR's Plainwell office on July 19, 1991 and the notification is attached to this summary.

The second report was for a loss of hydrazine from Palisades' main outfall and occurred on August 20, 1991. The near empty 250 gallon hydrazine tank was refilled with 14 liters of 35% hydrazine and dilution water. The dilution water valve was left unattended, resulting in an overflow of the tank and it's containment. A report of this event was made to the MDNR's Plainwell Michigan office on August 21, 1991 and the notification is attached to this summary.

Other activities that may be of interest pertaining to water quality are summarized below.

1. Consumers Power Company received approval from the MDNR's Plainwell office to use Betz Clam Trol 1 to control the zebra mussel infestation at Palisades. Palisades has permission to treat for zebra mussels periodically (six treatments per year), throughout the year. The MDNR determined that no NPDES permit modifications were necessary because the existing permit has the means of handling these compounds in the discharge. The notification from the State of approval of our proposed methods for zebra mussel control is attached to this summary.
2. In response to our revision requests, a revised NPDES permit was issued in August, 1991. The Palisades Environmental Protection Plan, Appendix B to the Facility Operating Licensee, Section 3.2, requires that the NRC be notified of proposed changes to the NPDES permit. CPC's April 16, 1991 and May 13, 1991 letters to the NRC provided the notification of our submittal of NPDES permit revision requests to the State of Michigan. The State's approval of our requests and the issuance of a revised NPDES permit was the subject of CPC's September 9, 1991 letter to the NRC. The revisions to the permit are summarized as follows.
 - a. Provisions were added to the permit to allow for continuous chlorination, with a maximum chlorine concentration to the lake of .036 ppm total residual chlorine. Continuous chlorinization can be used as a zebra mussel deterrent and an NPDES permit revision was required prior to using this method.

- b. The necessity to perform a short term boron waste characterization study was deleted from the permit. Palisades was scheduled to perform a boron waste discharge study during one month of each quarter for one year beginning July 1, 1991 to July 1, 1992. Since the plant's use of boron was revised following the replacement of the steam generators and because more information is now known about the effects of discharging small amounts of boron, the characterization study was no longer needed.



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**POWERING
MICHIGAN'S PROGRESS**

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

AAC91*051

July 19, 1991

Mr. John Vollmer
Michigan Department of Natural Resources
Plainwell Office
621 Tenth Street
P. O. Box 355
Plainwell, MI 49080

Dear Mr. Vollmer:

On Wednesday, July 10, 1991 at 0830 on the Palisades Plant site (northwest corner of the parking lot), the sewage transfer pumps (P 967A & B) engaged to empty the holding tanks located on the north end of the plant site. As line pressure began to increase, a cracked sewer cleanout cover failed, resulting in approximately 200 gallons of liquid sewage to flow into the parking lot and into the storm drain system. The discharge end of the storm drain system was inspected for evidence of sewage discharged. There was no indication of any sewage present. Corrective action is underway to prevent reoccurrence.

Should you have any additional questions regarding this matter, please call me at (616) 764-8913 ext. 0464.

Sincerely,

Anthony A. Calloway

Anthony A. Calloway
Environmental Coordinator

cc: DDHice, Palisades
RMRice, Palisades
RLFobes, P12-107
PBLatvaitas, P12-305

OC0791-0384A-OP02

A CMS ENERGY COMPANY

REPORT OF OIL, SALT OR POLLUTING MATERIAL LOSSES

Pursuant to the provisions of Act 245 of the Public Acts of Michigan 1929 as amended, regulations have been issued which require that all Owners, Managers or Operators of vessels, oil storage or on land/facilities shall notify the Water Resources Commission or his authorized representative of oil, salt and polluting material losses. This notification shall be made promptly by telephone or telegraph, giving briefly the particulars, and by mail, giving a detailed account of events and conditions.

Date	Company Name	
10 JULY 1991	Consumers Power Company	
PALISADES PLANT		
Location of Loss (Be Specific)		
Palisades Nuclear Plant Release of liquid sewage from a cleanout cover of the newly constructed sewer line at the north end of the parking lot.		
Material Lost	Amount	Name of Surface Water Involved
Liquid sewage	approx 200 gal.	None released to the water
Date Loss was Discovered	Time of Discovery	
10 JULY 1991	0830	
Name of Department of Natural Resources Representative Contacted		
JOHN BANTJES		
Telephoned or Telegraphed by Whom		Time
ANTHONY A GALLOWAY		10 JULY 1991 14:55
Cause of Loss (include Type of Equipment and Other Details)		
A PVC cap is used on the sewer line. This cap apparently is in a high traffic area. Once the cap cracked, a release of liquid sewage occurred. Within minutes the system was secured from service and preventive measures were initiated.		
Nature of Loss (include Complete Description of Damage)		
Liquid sewage		
Additional Comments (Include Method of Control, Plans for Prevention or Recurrence, etc)		
The system was secured from service. A sanitary waste hauler was called to pump sewage from the septic tanks. The cap from the cleanout line was replaced and sealed. Further investigations are ongoing to prevent recurrence.		
Company Name	By Signature	
Consumers Power Company	<i>Anthony A Galloway</i> 7-10-91	

Return this form to: Environmental Department
Parnall Road
Jackson, Michigan

24 Hours Emergency Notification Number:
(800) 292-4706

CC: KMHaas
JHager
DCC: 950/72*40*11 x72*40*12/50

PL0883-0021G-DM01

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Consumers
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**POWERING
MICHIGAN'S PROGRESS**

General Offices: 212 West Michigan Avenue, Jackson, MI 49201 • (517) 788-0550

August 21, 1991

M905
21EP10.1

Mr John Vollmer
Michigan Department of Natural Resources
PO Box 355
621 N 10th Street
Plainwell, MI 49080

RE: HYDRAZINE LOSS AT CONSUMERS POWER COMPANY'S
PALISADES PLANT, COVERT, MICHIGAN

Dear Mr Vollmer

Enclosed is an Oil, Salt or Polluting Material Loss Report (Form 4616) for a hydrazine loss which was reported to Mr Fred Morley and Mr Tim Hauck on August 20, 1991. Briefly, at 2300 hours on August 19, 1991 the near empty 250 gallon hydrazine fill tank was refilled with 14 liters of 35% hydrazine and dilution water. The dilution water valve was left unattended resulting in an overflow of hydrazine fill tank containment which was discovered and corrected at 0045 hours on 8/20/91.

An undetermined amount of dilute hydrazine overflowed the enclosed 250 gallon hydrazine fill tank and 545 gallon containment, traveled 10-12 feet to the turbine building sump then about 200 feet to the facility mixing basin and about 30 feet to NPDES Outfall 001. Water in the turbine sump and mixing basin were periodically analyzed and indicated NPDES outfall concentrations of hydrazine were minimal. Turbine sump concentrations were 25 ppb at 0100 hours, 230 ppb at 0445 hours and 48 ppb at 0550 hours. Mixing basin concentrations were less than 5 ppb at 0355 hours, 7 ppb at 0445 hours, 6 ppb at 0550 hours and less than 5 ppb at 0750 hours. At 0100 hours hydrazine concentrations in the containment area were 900 ppm.

The dilute hydrazine solution was removed from the containment area and placed in waste drums for proper handling. Analytical data indicate that a very small amount of hydrazine, well under one pound, was discharged to Lake Michigan.

OC0891-0046A-EN04

A CMS ENERGY COMPANY

If you have any comments or need additional information, please contact me at 517-788-1975.

Brad Latvaitis

Brad Latvaitis
Spill Plan Coordinator

CC Mr Tim Hauck, MDNR

BCC ~~Brett Baker~~, Palisades
ACCalloway, Palisades
RLFobes, P-12-107
BWRasher, P-12-103
JJRochow, P-12-309B
ATUdrys, M-1023

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
REPORT OF OIL, SALT OR POLLUTING MATERIAL LOSSES

Pursuant to the provisions of Act 245 of the Public Acts of Michigan 1929 as amended, regulations have been issued which require that all owners, managers or operators of vessels, oil storage or on land facilities shall notify the Water Resources Commission or his authorized representative of oil, salt and polluting material losses. This notification shall be made promptly by telephone or telegraph, giving briefly the particulars, and by mail, giving a detailed account of events and conditions.

Date AUGUST 20, 1991		Company Name CONSUMERS POWER COMPANY	
Location of Loss (Be Specific) PALISADES Nuclear Plant, Covert, Michigan			
Turbine Building, West SIDE to Outfall 001, NPDES Permit MI0049131			
Material Lost Hydrazine	Amount less than one pound	Name of Surface Water Involved LAKE MICHIGAN	
Date Loss was Discovered AUGUST 19, 1991		Time of Discovery 2300 hours	
Name of Department of Natural Resources Representative Contacted MR FRED MORLEY			
Telephoned or Telegraphed by Whom BRAD LATVANTIS			Time 0830 hours, 8/20/91
Cause of Loss (Include Type of Equipment and Other Details) Hydrazine fill tank dilution water valve was left unattended after adding 14 liters of 35% hydrazine to a near empty 250 gallon hydrazine fill tank.			
Nature of Loss (Include Complete Description of Damage) The 250 gallon hydrazine fill tank overflowed to a 545 gallon containment which overflowed to the turbine building sump (10-12 feet away) traveled about 200 feet to the Plant mixing basin then about 30 feet to NPDES outfall 001. Analytical data indicate most of the hydrazine was used-up before reaching 001. No damage was observed.			
Additional Comments (Include Method of Control, Plans for Prevention of Recurrence, etc) The operators will be advised to never leave a valve unattended when in use. This advice will be reinforced in training.			
Company Name CONSUMERS POWER COMPANY		By (Signature) Brad Latvantis & Brett Baker	

24-Hr Emergency Notification Number
(800) 292-4706

Return this form to:

Environmental Department
Parnall Road
Jackson, Michigan

NATURAL RESOURCES COMMISSION
MARLENE J. PLUMHARTY
GORDON S. GUYER
O. STEWART MYERS
RAYMOND POUPORE



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

DELBERT RECTOR, Director

District 12 Headquarters
P.O. Box 355, Plainwell, Michigan 49080

July 17, 1991

Mr. Ron Fobes
Consumers Power
212 West Michigan Avenue
Jackson, Michigan 49201

RE: Approval of Zebra Mussel Control

Dear Mr. Fobes,

Your request of April 1, 1991, regarding Zebra Mussel Control has been reviewed. Basically, the request entailed the use of continuous chlorination, Betz Clam Trol CT-1, and Nalco Acti-Brom (Nalco 1338). I was informed by our Lansing staff that no permit modification is necessary because the existing permit has the means of handling these compounds in the discharge. Chlorination is already covered on Page 2 of 16 of Palisades NPDES Permit. Clam Trol and Nalco Acti-Brom are water treatment additives and are covered on page 3 of 16.

Chlorination

The existing permit allows the discharge of chlorine at 0.1 mg/l on a monthly average and 0.2 mg/l on a daily maximum between June 1 and September 30. From October 1 to May 31, the average is 0.05 mg/l and the maximum is 0.2 mg/l. These levels are already higher than the levels which you requested. There is no language in the existing permit that would prevent Palisades from using continuous chlorination.

Nalco Acti-Brom

I have not received a response from GLEAS on Nalco Acti-Brom. I am inquiring with them now. Rather than delay Palisades zebra

mussel program I will respond concerning Acti-Brom in a separate letter, as soon as possible. Considering that Acti-Brom is a chlorine enhancer, perhaps you can proceed without it, using continuous chlorination, while I inquire with GLEAS.

Betz Clam Trol CT-1

Your request to use Betz Clam Trol CT-1 has been reviewed and approved by our Great Lakes and Environmental Assessment Section. Per their recommendations, this approval is subject to several conditions:

1) The level of Clam Trol in the discharge must not exceed 0.08 mg/l.

2) This level may be determined by analysis or, if an approved analytical technique is not available, then the level may be determined by calculation of the mass balance through the system.

3) Palisades must submit this data to the Plainwell Office by 90 DAYS. If the levels do not exceed 0.08 mg/l, then Palisades may continue to use Clam Trol. If the levels exceed 0.08 mg/l, then Palisades will have three months to bring its discharge into compliance with the limit.

If you have any questions on this letter, feel free to call me at 616-685-9886.

Sincerely,



John Vollmer
Surface Water Quality Division

Fax: Don Hice
Tony Calloway

cc: J. Gahsman