

March 20, 1996



VIRGINIA POWER

HAND DELIVERED

Camille S. Cook
Piedmont Regional Office
Department of Environmental Quality
4949-A Cox Road
Glen Allen, VA 23060-5106

**RE: SURRY POWER STATION - VPDES PERMIT NO. VA0004090
APPLICATION FOR REISSUANCE**

Dear Ms. Cook:

Enclosed are the original and five copies of the application for reissuance of the VPDES permit for Surry Power Station. This application covers all process related discharges. Application for authorization of storm water discharges was previously submitted.

The data provided on the Intake and Effluent Characteristics forms (2C, V) were generated from Discharge Monitoring Reports for the period January 1992 through July 1995, and special sampling during May 1995. Two exceptions to the DMR data are the deletion of measurements from March 1993 for Outfall 011, and from December 1994 for Outfall 181. In those cases, unusual events occurred that produced effluent parameters that do not reflect normal discharges and, in both occurrences, inclusion of the measurements made would have skewed the data used in the application. In both of those instances, the events were reported as required by the current permit.

We request waivers from some of the specified permit application requirements in the following issues:

1. Essentially identical discharges-Outfalls 031, 041, 081, 141, 151, 161, 171 and 241 are all low volume process wastewater sumps that have identical or similar contaminants and concentrations, and receive comparable treatment prior to discharge. Outfall 081 was sampled and analyzed to characterize all of these outfalls for parameters not included in the DMR data. Outfalls 181 and 191 are identical steam generator blowdown discharges; both are characterized by samples from 181. Outfalls 221 and 231 are identical condenser hot well drains; 231 was sampled to provide information for both. We request waivers from individual sampling and analysis of the characterized outfalls.

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2. Non-contact cooling waters- Outfall 001 is a large volume flow, once through, non-contact cooling water. We request waivers from any parameters not provided in Section V. Analysis, testing and reporting on this discharge are currently being conducted in accordance with the Toxics Management Program contained in the current VPDES permit, which we expect will be continued in the reissued permit. Due to the size and nature of the discharge, we do not believe that additional analyses would accurately represent plant processes or the impact of station operations.
3. Intermittent, non-wastewater discharges- Outfalls 002, 071, 091, 251 and 261 are low volume, non-process discharges that do not fall under the Steam Electric Effluent Guidelines. The 002 and 071 discharges consist entirely of storm water and involve no process wastes. Outfall 091 is, initially, a discharge of deionized lay up water from the package boiler that is only released after storage periods. (After layup, the boiler water is analyzed for hydrazine and, if present, the water is drained to the neutralization sumps for treatment.) During boiler operation, the discharge consists of deionized water with trace (1 ppm) concentrations of trisodium phosphate and sodium sulfite. Outfalls 251 and 261 discharge deionized water that has been filtered after hydrolasing of the steam generators. Data supplied for these outfalls are from the previous DMR information. We request waivers from all other testing requirements not provided in the application.
4. Uncontaminated side streams- Outfalls 201 and 211 are portions of the non-contact cooling water that are diverted through the recirculation spray heat exchangers. No process wastewater or pollutants from other sources are added. Only DMR data are provided. We request that requirements for any other testing not provided in the application be waived.

We also request that the following issues be considered in the reissuance of the permit:

1. Outfall 002 requirements- We request that the size, nature and location of the 002 discharge be reconsidered and best professional judgement be applied in evaluation of appropriate limitations, monitoring requirements, and other conditions applied to this outfall. The 002 discharge consists of storm water from an oil tank containment berm. The discharge is small and very infrequent and goes into a small ditch far from any natural watercourse. Due to the sandy soil, most of the discharge likely seeps into the ground before entering the drainage leading to a small, unnamed tributary that then flows

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a considerable distance, through beaver pond areas, before entering the swamp at Hog Island. We do not believe that extensive monitoring and analyses, particularly under the Toxics Management Plan, are necessary at this outfall to provide adequate protection of human health and the environment.

2. Storm water- As noted in our earlier application for authorization of storm water discharges, all industrial processes at Surry Power station are under roof and not exposed to storm water. Those station wastewater discharges that enter storm water conveyances are treated and monitored prior to mixing with storm water. We request that the reissued permit follow the DEQ policy applied in the recently reissued permit for North Anna Power Station in which the storm water discharges received authorization without additional monitoring requirements.
3. Deleted outfalls- The application was prepared using the same outfall designations as the current permit. Some outfall numbers have been deleted. The oil/water separator previously permitted as Outfall 021 no longer has a discharge. Any oily water collected is now treated at the Gravel Neck oil/water separator that discharges to the Settling Pond (Outfall 101). Outfall 051 is not needed because the Unit 1 Flash Evaporator equipment has been abandoned in place. The Boron Recovery System previously discharging through Outfall 121 has been dismantled. The current permit identifies a Liquid Waste System as Outfall 111 and a Laundry as 131. These operations are combined as the Radwaste Facility, Outfall 111, deleting 131.
4. Alternative effluent limitations-As stated during application for the current permit, and noted in Special Condition 13 of the current permit, there have been no substantial changes in the conditions described in our request for a variance under Section 316(a). We request that the 316(a) variance be continued in the reissued permit.
5. Monitoring locations-The current permit limitations and monitoring requirements pages state that "discharges shall be limited and monitored at outfall xxx . . ." However, most of the station's actual outfalls are not accessible. The application contains an attachment titled "Surry Power Station-Outfall Descriptions" that identifies the sampling points used to monitor the various discharges.

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6. Additional information-Since this is application for reissuance of a permit for an existing facility that has been under prior permits, extensive information has previously been submitted to the DEQ. We request that the agency files on this facility be considered a part of this application as a source for additional information that may be needed in support of the present application and permit development.

Should you desire additional information or have any questions, please contact Daniel James at (804)273-2996. You are invited to visit the station as early as possible in the permit development procedure, at your convenience, to become familiar with the equipment, processes and layout or to clarify any questions or concerns you may have. Please contact Mr. James to make arrangements for your visits.

Sincerely,



A. W. Hadder
Manager
Environmental Policy and Compliance - Water/Waste

DLJ/jmh

Enclosures

cc w/ attachments:

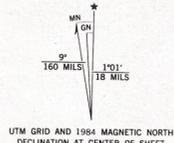
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., NW
Suite 2900
Atlanta, GA 30323
Re: Surry Units 1 & 2
Docket Nos. 50-280/50-281
License Nos. DPR-32/DPR-37

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555
Re: Surry Units 1 & 2
Docket Nos. 50-280/50-281
License Nos. DPR-32/DPR-37

Mr. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station



Mapped, edited, and published by the Geological Survey in cooperation with Commonwealth of Virginia agencies Control by USGS and NOS/NOAA
Topography by photogrammetric methods from aerial photographs taken 1963. Field checked 1965. Revised from aerial photographs taken 1978. Field checked 1982. Map edited 1984
Supersedes Army Map Service Cobham Bay map dated 1957
Selected hydrographic data compiled from NOS chart 12248 (1982) This information is not intended for navigational purposes
Polyconic projection. 10,000-foot grid ticks based on Virginia coordinate system, south zone
1000-meter Universal Transverse Mercator grid, zone 18
1927 North American Datum
To place on the predicted North American Datum 1983 move the projection lines 11 meters south and 29 meters west as shown by dashed corner ticks
There may be private inholdings within the boundaries of the National or State reservations shown on this map



SCALE 1:24 000
CONTOUR INTERVAL 10 FEET
SUPPLEMENTARY CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS MEAN LOW WATER
THE RELATIONSHIP BETWEEN THE TWO DATUMS IS VARIABLE
SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER
THE MEAN RANGE OF TIDE IS APPROXIMATELY 2.1 FEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225,
OR RESTON, VIRGINIA 22092
AND VIRGINIA DIVISION OF MINERAL RESOURCES, CHARLOTTESVILLE, VIRGINIA 22903
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST



ROAD CLASSIFICATION
Primary highway, hard surface
Secondary highway, hard surface
Unimproved road
Light-duty road, hard or improved surface

○ Interstate Route ○ U.S. Route ○ State Route

HOG ISLAND, VA.
37076-B6-TF-024
1984
DMA 5658 II NW—SERIES V834

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