

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

November 30, 1984

PRINCIPAL STAFF

RA DRP DAGS

D/RA DRS LOSS

RC DRSS LOVA

PAO ML

SGA OL

EIC OI

DRMA FILE NAS

IL FILE COPY

James G Keppler, Administrator Region III US Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - COPIES OF NON-RADIOLOGICAL NPDES PERMIT VIOLATION REPORTS

Section 3.2 entitled "Reporting Related to the NPDES Permits and State Certification" of Appendix B to Provisional Operating License No DPR-20 Palisades Plant Consumers Power Company Docket 50-255 Environmental Protection Plant (Non-Radiological) dated January 22, 1981 states that copies of reports to the state of Michigan indicating violation of NPDES permits are to be sent to the NRC. Attached to this letter are copies of ten (10) NPDES Notifications covering the six (6) month period from May 1984 through October 1984. Also attached are copies of one (1) Report of Oil, Salt or Polluting Material Losses that occurred during the same period and one (1) revision to Report PAL 83-08-AD86.

Suan Collus

Brian D Johnson Staff Licensing Engineer

CC Director, Office of Nuclear Reactor Regulation Director, Office of Inspection and Enforcement NRC Resident Inspector - Palisades

Attachments

8412110337 841130 PDR ADDCK 05000255 R PDR DEC 3 1984

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#### ATTACHMENT

Consumers Power Company
Palisades Plant - Docket 50-255

COPIES OF NON-RADIOLOGICAL NPDES PERMIT VIOLATION REPORTS
May 1984 through October 1984



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NUCLEAR LICENSING

COPY

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

June 11, 1984

Mr Fred Morley District Supervisor Plainwell District Office Building 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-05-AD93

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-05-AD93 is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes Senior Environmental Advisor

CC USEPA, Enforcement Division, Region V
BCC RBDeWitt, P-26-117B

KBieszke, P-24-329

BDJohnson, P-24-606

BWMarguglio, JSC-220A

RWMontross, Palisades

WPMullins, Palisades

SPierce, Palisades

JRSchepers, P-24-314

ATUdrys, M-1023

### NPDES NOTIFICATION Apparent Difference From Daily Average/Maximum Limitation June 11, 1984

Plant: Palisades

Permit No: MI 0001457

Outfall Description:

Turbine Sump Oil Separator

Discharge (00G)

Outfall Code No: 800218

Parameter: Oil and Grease (Freon)

Parameter Code No: 00556

1. Date of Incident: May 29, 1984

 Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on May 29, 1984 at 0830 hours measured 43 mg/L. The plant received the notification and the analytical results on June 1, 1984 at 1430 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA.

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

A change of the emulsion breaker filter was requested on June 1, 1984 at 1530 hours. The emulsion breaker filters were changed on June 2, 1984 at 0510 hours.

7. Additional Comments:

NA

8. Signed: Ronald & Fobes

**RLFobes** 



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General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

July 12, 1984

Mr Fred Morley District Supervisor Plainwell District Office Bldg 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-07-AD95

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-07-AD95, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes

Senior Environmental Advisor

Ronald L Fobes

CC USEPA, Enforcement Division, Region V

BCC RBDeWitt, P-26-117B

KFBieszke, P-24-329

BDJohnson, P-24-606

BWMarguglio, JSC-220A

RWMontross, Palisades

WPMullins, Palisades

SFPierce, Palisades

JRSchepers, P-24-314

ATUdrys, M-1023

### NPDES NOTIFICATION Apparent Difference From Daily Average/Maximum Limitation July 12, 1984

Plant: Palisades Permit No: MI 0001457

Outfall Description: Turbine Sump Oil Separator Outfall Code No: 800218

Discharge (00G)

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: July 2, 1984.

2. Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitations of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on July 2, 1984 at 0900 hours measured 26.8 mg/L. The plant received the notification and the analytical results on July 6, 1984 at 1600 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA.

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

The emulsion breaker filters were changed and the turbine building sump and tank T-41 oil absorbent pads were changed.

7. Additional Comments:

The final discharge to Lake Michigan (Outfall 001) showed no visible oil.

8. Signed: Ron Foles

R L Fobes



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General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

July 12, 1984

Mr Fred Morley District Supervisor Plainwell District Office Bldg 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-05-AD94

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-05-AD94, is submitted as a report of an apparent difference from the monitoring requirements for this facility.

If you have any questions regarding the attached report, please contact this office.

Ronald I Fobes

R L Fobes Senior Environmental Advisor

BCC RBDeWitt, P-26-117B KFBieszke, P-24-329 BDJohnson, P-24-606 BWMarguglio, JSC-220A RWMontross, Palisades WPMullins, Palisades SFPierce, Palisades JRSchepers, P-24-314 ATUdrys, M-1023

Incident No: PAL-84-05-AD94

#### NPDES NOTIFICATION

Apparent Difference From Daily Average/Maximum Limitation
July 12, 1984

Plant: Palisades Permit No: MI 0001457

Outfall Description: Neutralizer Tank Wastes (00F) Outfall Code No: 800213

Parameters: pH, Sulfates, Suspended Solids, Flow Parameter Code No: 00400,

00945, 00530, 50050,

Respectively

1. Date of Incident: May 20, 1984 and June 15, 1984.

Identification of specific effluent limitation or monitoring requirement affected:

A recent letter from the State dated March 29, 1984 requires that the temporarily rerouted demineralizer rinse line be monitored in the same fashion as the neutralizer tank discharge was monitored.

3. Description of Incident:

On May 20, 1984 and June 15, 1984 the demineralizer rinse water was discharged to the lake without the required monitoring.

4. Apparent Cause:

Lack of communication between the plant's Operations Department and Chemistry Department.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA.

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

The neutralizer tank (T-921) was returned to service on June 16, 1984 at 1710 hours. Normal sampling of the neutralizer tank for Outfall 00F was resumed.

7. Additional Comments:

The estimated release for each occurrence was approximately 50,000 gallons of rinse water with an estimated pH of 6.0,  $SO_4$  was < 1 ppm and suspended solids would be < 1 ppm.

8. Signed: Ronald & Foles

R L Fobes



GOPY

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

July 18, 1984

Mr Fred Morley District Supervisor Plainwell District Office Building 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-07-AD96

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-07-AD96, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes Senior Environmental Advisor

CC USEPA, Enforcement Division, Region V
BCC RBDeWitt, P-26-117B
 KFBieszke, P-24-329
 BDJohnson, P-24-606
 BWMarguglio, JSC-220A
 RWMontross, Palisades
 WPMullins, Palisades
 SFPierce, Palisades
 JRSchepers, P-24-314
 ATUdrys, M-1023

File No P10.2.1 Incident No: PAL-84-07-AD96

#### NPDES NOTIFICATION

Apparent Difference From Daily Average/Maximum Limitation July 18, 1984

Plant: Palisades Permit No: MI 0001457

Outfall Description: Turbine Sump Oil Separator

Discharge (00G)

Outfall Code No: 800218

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: 7/7/84

2. Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on 7/7/84 at 1040 hours measured 31.1 mg/L. The plant received the notification and the analytical results on 7/12/84 at 0930 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker.

5. If not immediately corrected, the anticipated time the condition is expected . to continue:

NA:

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

The emulsion breaker filters and the tank T-41 oil absorbent pads were both replaced.

7. Additional Comments:

The final discharge to Lake Michigan (Outfall 001) showed no visible oil.

8. Signed: RLF

R L Fobes



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

July 24, 1984

Mr Fred Morley District Supervisor Plainwell District Office Building 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-07-AD97

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-07-AD97, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes . . Senior Environmental Advisor

CC USEPA, Enforcement Division, Region V
BCC RBDeWitt, P-26-117B
 KFBieszke, P-24-329
 BDJohnson, P-24-606
 BWMarguglio, JSC-220A
 RWMontross, Palisades
 WPMullins, Palisades
 SFPierce, Palisades
 JRSchepers, P-24-314
 ATUdrys, M-1023

File No P10.2.1

Incident No: PAL-84-07-AD97

## NPDES NOTIFICATION Apparent Difference From Daily Average/Maximum Limitation July 24, 1984

Plant: Palisades Permit No: MI 0001457

Outfall Description: Turbine Sump Oil Separator

Discharge (00G)

Outfall Code No: 800218

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: 7/16/84

2. Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on 7/16/84 at 1015 hours measured 26.5 mg/L. The plant received the notification and the analytical results on 7/19/84 at 1600 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA:

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

Confirmed that emulsion breaker filters were changed out on 7/17/84. Confirmed that the tank T-41 oil skimmers were emptied on 7/19/84.

7. Additional Comments:

The final discharge to Lake Michigan (Outfall 001) showed no visible oil.

8. Signed:

R L Fobes RZF



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

August 3, 1984

Mr Fred Morley District Supervisor Plainwell District Office Building 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-07-AD98

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-07-AD98, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes RLF.
Senior Environmental Advisor

File No P10.2.1

Incident No: PAL-84-07-AD98

#### NPDES NOTIFICATION Apparent Difference From Daily Average/Maximum Limitation August 3, 1984

Plant: Palisades

Permit No: MI 0001457

Outfall Description: Turbine Sump Oil Separator

Outfall Code No: 800218

Discharge (00G)

Parameter: Oil and Grease (Freon)

Parameter Code No: 00556

1. Date of Incident: 7/24/84

2. Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on 7/24/84 measured 28.4 mg/L. The plant received the notification and the analytical results on 7/26/84 at 0800 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker filters.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

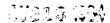
The emulsion breaker filters were changed. The oil absorbers in the turbine building sump and Tank T-41 were also replaced.

7. Additional Comments:

The final discharge to Lake Michigan (Outfall 001) showed no visible oil. A sample of Tank T-41 discharge on 7/25/84 measured 4.0 mg/L oil and grease.

8. Signed:

R L Fobes





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

GOPY

August 9, 1984

Mr Fred Morley District Supervisor Plainwell District Office Building 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-07-AD99

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-07-AD99, is submitted as a report of an apparent difference from the monthly average effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes

Senior Environmental Advisor

Ronald & Fobes

BCC RBDeWitt, P-26-117B
KFBieszke, P-24-329
BDJohnson, P-24-606
BWMarguglio, JSC-220A
RWMontross, Palisades
WPMullins, Palisades
SFPierce, Palisades
JRSchepers, P-24-314
ATUdrys, M-1023

File No Pl0.2.1 Incident No: PAL-84-07-AD99

## Apparent Difference From Daily Average/Maximum Limitation August 9, 1984

Plant: Palisades Permit No: MI 0001457

Outfall Description: Turbine Sump Oil Separator Outfall Code No: 800218

Discharge (00G)

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: 7/31/84

Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease monthly average limitation of 15 mg/L.

3. Description of Incident:

The monthly average oil and grease concentration for July measured  $20.2\ \mathrm{mg/L}$ .

4. Apparent Cause:

Plant start-up from cold shutdown following major repairs and modifications placed above-normal loads on the oily waste handling system resulting in four exceedances of the daily maximum oil and grease limits during the month of July (previously reported). As a result of these four exceedances, the July monthly average limit of 15 mg/L was also exceeded.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA

- 6. Corrective Action In addition to increasing the frequency of emulsion breaker filter changes mentioned in the previous reports, increased surveillance and cleaning up of oil and grease in the turbine building were initiated.
- 7. Additional Comments:

None of the oil and grease excursions for the month of July resulted in any visible oil reaching Lake Michigan.

8. Signed:

R L Fobes RZF



GOPY

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

September 15, 1983

Mr W L Marks Acting Chief Engineer Michigan Water Resources Commission Stevens T Mason Bldg Lansing, MI 48926

FILE NO: P10.2.1

INCIDENT NO: PAL-83-08-AD86

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-83-08-AD86, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes Senior Environmental Advisor

CC USEPA, Enforcement Division, Region V
BCC RBDeWitt, P-26-117B

KBieszke, P-24-329

BDJohnson, P-24-606

BWMarguglio, JSC-220A

RWMontrose, Palisades

WPMullins, Palisades

SPierce, Palisades

JRSchepers, P-24-314

ATUdrys, M-1023

File No P10.2.1 Incident No: PAL-83-08-AD86

### NPDES NOTIFICATION Apparent Difference From Daily Average/Maximum Limitation September 15, 1983

Plant: Palisades Permit No: MI 0001457

Outfall Description: Turbine Sump Oil Separator Outfall Code No: 800218

Discharge (00G)

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: 8/15/83 and 8/18/83

 Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

Routine weekly grab samples for oil and grease collected on 8/15/83 and 8/18/83 measured 35.2 and 27.5 mg/L, respectively.

4. Apparent Cause:

Malfunction of the emulsion breaker system.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

The emulsion breaker oil filters were changed on 8/18/83.

7. Additional Comments:

The plant also initiated an event report to the Nuclear Regulatory Commission. A plant transient had caused additional oil loading on the filters. On 8/14/83, an oil leak occurred on the K7B feedwater pump. Observations of the mixing basin discharge showed no visible oil on the receiving waters.

8. Signed:

R L Fobes RIF

# 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	Company Name	<del></del>	
9/25/84	Consumers Power Company		
Location of Loss (Be Specific)	Consumers rower comp	dily	
Palisades Nucl	ear Power Plant. Route	2; Box 154; Covert, MI 4904	3
102250000 11002	cur rower rame, nodec	2, 201 134, 00vere, 111 4904	
Material Lost	Amount	Name of Surface Water Involved	
Fuel Oil			
Date Loss was Discovered		Time of Discovery	
9/25/84		1730	
Name of Department of Natural Resou	rces Representative Contacted		
Peas Operator	28		· <u></u>
Telephoned or Telegraphed by Whom			Time
David H Andrews	·		1940 9/25/84
Cause of Loss (Include Type of Equipment and Other Details)			
Overfilling of T-10 diesel oil storage tank during a routine filling operation.			
·			·
Nature of Loss (Include Complete Desc			
		release to Lake Michigan ar	nd no release to the
		release to Lake Michigan ar	nd no release to the
An inspection of the ar	rea indicated no direct	release to Lake Michigan ar	•
An inspection of the an	rea indicated no direct	analysis of groundwater fro	om monitoring wells
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An inspection of the and lake via the storm drain (1 well north and 1 well	rea indicated no direct inage system. A visual	analysis of groundwater fro	om monitoring wells in the groundwater.
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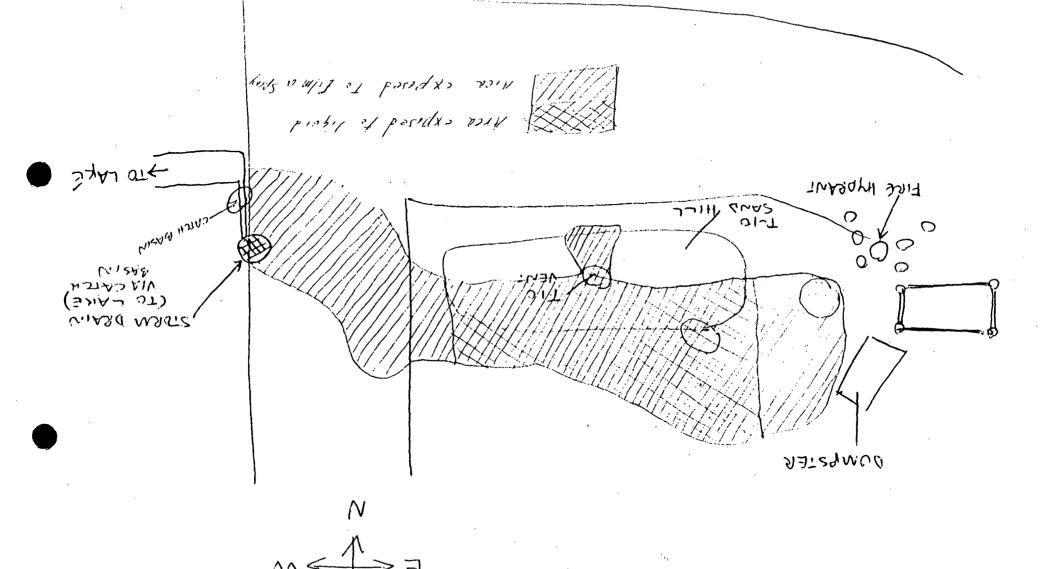
24-Hr Emergency Notification Numbe

(800) 292-4706

MRP-10/5/84

Return this form to:

Environmental Department Parnall-Road Jackson, Michigan



#### ATTACHMENT

#### PALISADES NUCLEAR POWER PLANT 9/25/84 FUEL OIL LOSS REPORT

#### Clean-up Activities

Initially, approximately 80 yards of sand containing the spilled fuel oil was removed for disposal at Orchard Hill Landfill.

Through visual observation of the excavated area it was determined that the vertical dispersion of fuel oil either from this loss or a previous loss or losses resulted in the presence of oil at deeper depths.

Additional excavations made on Monday, October 1, 1984 and Tuesday, October 2, 1984 resulted in an additional 120 cubic yards of soil removed from the south, north and west sides of the tank. On the south side excavation, oil removal was halted when the water table was encountered approximately  $1-1\frac{1}{2}$  feet above the tank bottom. After several minutes, a visible layer of fuel oil was observed on the free surface of the water in the excavation.

The north side excavation resulted in fuel oil being observed down to the water table; however, very little oil was seen on the surface water.

All soils with visual signs of oil have been removed. Absorbent pads were used to absorb fuel oil on the free surface of the water in the excavations. This was discontinued on Friday, October 5, 1984 due to an observed lack of oil. We are also evaluating methods for preventing recurrence of this event and necessary equipment and/or operating modifications.

MRP/mlp 10/5/84



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OCT 41984

NUCLEAR LICENSING

GOPY

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

October 2, 1984

P10.1.2

Mr Fred Morely Michigan Department of Natural Resources District Office PO Box 355 Plainwell, MI 49080

PALISADES PLANT - NPDES NOTIFICATION REPORT PAL-83-08-AD86

Through an internal review process it was recently determined that NPDES Notification Report PAL-83-08-AD86 submitted September 15, 1983 was incomplete. The report should have addressed the exceedance of the daily maximum effluent limit of 20 mg/l oil and grease for the turbine sump oil separator discharge (Outfall 00G) on August 15 and 18, 1983. Through an oversight, the August 18, 1983 excursion was not included in the submitted report. The original September 15, 1983 report has been revised to include the August 18, 1983 excursion (attached). Please replace the old incomplete September 15, 1983 report with the attached, revised report.

Should you have any questions regarding this matter, please let me know.

R L Fobes

Senior Environmental Advisor

Ronald I Foles-

CC USEPA, Enforcement Division, Region V

BCC RBDeWitt, P-26-117B
KFBieszke, P-24-329
BDJohnson, P-24-606
BWMarguglio, JSC-220A
RWMontrose, Palisades
WPMullins, Palisades
SPierce, Palisades
JRSchepers, P-24-314
ATUdrys, M-1023



COT 4004

NUMBERAL BEENSING

GOPY

October 3, 1984

Mr Fred Morley District Supervisor Plainwell District Office Building 621 North 10th Street PO Box 355 Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-09-AD100

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-09-AD100, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes Senior Environmental Advisor

CC USEPA, Enforcement Div, Region V
BCC RBDeWitt, P-26-117B
 KFBieszki, P-24-329
 BDJohnson, P-24-606
 BWMarguglio, JSC-220A
 RWMontross, Palisades
 WPMullins, Palisades
 SFPierce, Palisades
 JRSchepers, P-24-314
 ATUdrys, M-1023

## NPDES Notification Apparent Difference From Daily Average/Maximum Limitation October 3, 1984

Plant: Palisades Permit No: MI0001457

Outfall Description: Turbine Sump Oil Separator Outfall Code No: 800218

Discharge (00G)

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: 9/17/84

2. Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on 9/17/84 measured 22.3 mg/L. The plant received the notification and the analytical results on 9/20/84 at 1050 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker filters.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

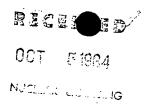
The emulsion breaker filters were changed on 9/18/84.

7. Additional Comments:

The final discharge to Lake Michigan (Outfall 001) showed no visible oil.

8. Signed: R L Fobes 72 F





GOPY

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

October 4, 1984

Mr Fred Morley
District Supervisor
Plainwell District Office Building
621 North 10th Street
PO Box 355
Plainwell, MI 49080

FILE NO: P10.2.1

INCIDENT NO: PAL-84-09-AD101

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-09-AD101, is submitted as a report of an apparent difference from the monitoring requirements for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes

Senior Environmental Advisor

Ronald I Foles

BCC RBDeWitt, P-26-117B

KFBieszki, P-24-329

BDJohnson, P-24-606

BWMarguglio, JSC-220A

RWMontross, Palisades

WPMullins, Palisades

SFPierce, Palisades

JRSchepers, P-24-314

ATUdrys, M-1023

### NPDES Notification Apparent Difference From Daily Average/Maximum Limitation October 4, 1984

Plant: Palisades . Permit No: MI0001457

Outfall Description: Discharge to Lake Michigan Outfall Code No: 800095

Outfall (001)

Parameter: pH Parameter Code No: 00400

1. Date of Incident: September 21-24, 1984

 Identification of specific effluent limitation or monitoring requirement affected:

The pH of the effluent to Lake Michigan is to be monitored on a continuous basis.

3. Description of Incident:

From September 21, 1984 at 1600 hours to September 24, 1984 at 0900 hours the Outfall 001 effluent pH was not monitored on a continuous basis.

4. Apparent Cause:

On September 21, 1984 the backup plant pH recorder chart paper was changed and it apparently did not advance properly. The primary in-line pH recorder (pHr-1312) was out of service awaiting repairs.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

Several attempts to realign the chart paper on September 22 and 23, 1984 failed. The problem however was corrected on September 24, 1984.

7. Additional Comments:

Daily readings of the effluent pH were taken and recorded. The primary pH monitor (pHr-1312) remains out of service awaiting parts for repair.

8. Signed: R L Fobes



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

GOPY

Mr Fred Morley
District Supervisor
Plainwell District Office Building

PO Box 355 Plainwell, MI 49080

621 North 10th Street

FILE NO: P10.2.1

October 30, 1984

INCIDENT NO: PAL-84-10-AD102

This is in regard to NPDES Permit No MI 0001457 for the Company's Palisades Plant. In accordance with Part II, A4, the attached "NPDES Notification," Incident No PAL-84-10-AD102, is submitted as a report of an apparent difference from the daily maximum effluent limitations for this facility.

If you have any questions regarding the attached report, please contact this office.

R L Fobes Senior Environmental Advisor

CC USEPA, Enforcement Div, Region V
BCC RBDeWitt, P-26-117B
 KFBieszke, P-24-329
 BDJohnson, P-24-606
 BWMarguglio, JSC-220A
 RWMontross, Palisades
 WPMullins, Palisades
 SFPierce, Palisades
 JRSchepers, P-24-314
 ATUdrys, M-1023

### NPDES Notification Apparent Difference From Daily Average/Maximum Limitation October 30, 1984

Plant: Palisades Permit No: MI0001457

Outfall Description: Turbine Sump Oil Separator Outfall Code No: 800218

Discharge (00G)

Parameter: Oil and Grease (Freon) Parameter Code No: 00556

1. Date of Incident: 10/22/84

2. Identification of specific effluent limitation or monitoring requirement affected:

Oil and grease daily maximum limitation of 20 mg/L.

3. Description of Incident:

A routine weekly grab sample for oil and grease collected on 10/22/84 measured 23.9 mg/L. The plant received the notification and the analytical results on 10/26/84 at 0900 hours.

4. Apparent Cause:

Apparent malfunction of the emulsion breaker filters.

5. If not immediately corrected, the anticipated time the condition is expected to continue:

NA.

6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:

The emulsion breaker filters were changed on 10/23/84.

7. Additional Comments:

The final discharge to Lake Michigan (Outfall 001) showed no visible oil. An oil and grease sample collected in October 1984 measured 9.9 mg/L.

8. Signed: R L Fobes