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METROPOLITAN EDISON COMPANY

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

June 20, 1977 GQL 0844

Director of Nuclear Reactor Regulation Attn: Mr. R. W. Reid, Chief Operating Reactors Branch No. 4 U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Sir:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License #DPR-50
Docket #50-289

In accordance with the TMI-1 Environmental Technical Specifications Section 5.6.2.4 (Item #2, concerning changes made in, or proposed for permits and/or licenses), enclosed please find:

- 1) Our May 5, 1977 letter requesting an amendment to Industrial Waste Permit (IWP) #2276209.
- PaDER letter of June 9, 1977 approving our request and amending IWP #2276209.

This amendment allows a maximum total suspended solids concentration of 100 ppm for the effluent of the TMI Industrial Waste Treatment System (IWTS). It is our estimation that, because the effluent TSS concentration will meet PaDER and EPA limitations, the environmental impact of this permit amendment will be negligible.

We trust this submittal to be satisfactory, however, should you have any additional questions, please contact me.

Sincerely,

J. G. Herbein Vice President

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Enclosure: 1) GQL 0602

2) DER letter of 6/9/77



METROPOLITAN EDISON COMPANY SUBMIDIARY OF GENERA

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

May 5, 1977 GQL 0602 bcc: B. J. Beck
J. J. Colitz
R. W. Dubiel
E. C. Fuhrer
J. G. Herbein
J. E. Mudge
R. M. Klingaman
W. E. Potts
C. W. Smyth

File 02.0016.0003.0050.02 63.0050.0021.0007*(Attack

Mr. Terry R. Fabian
Pa. Dept. of Environmental Resources
1002 Health & Welfare Building
Harrisburg, Pennsylvania 17120

Dear Sir:

Three Mile Island Nuclear Station (TMI-1)
Industrial Waste Permit #2270204 & #2276209

We would like to take this opportunity to review the subject of total suspended solids (TSS) concentration as discussed at the April 28, 1977 meeting of Met-Ed representatives and DER officials. At that meeting, Met-Ed noted that Module 4-2 of the application for Industrial Waste Permit #2276209 contained values for TSS which represented average, and not maximum, concentrations. As such, these figures should not be considered to be the maximum loading which the dual media filters of our treatment system will have to treat.

The design specifications for filter influent which Met-Ed presented to the manufacturer (U. S. Filter) were as follows:

	Component	Minimum Concentration	Average Concentration	Maximum Concentration
1)	Dissolved Iron (ppm)	0.1	0.3	0.5
2)	Suspended Iron (ppm)	1.0	4.0	12.0
3)	Suspended Solids (ppm)	15	60	175 -
4)	Oil & Grease (ppm)	3	40	180
5)	pН	7.3	9.4	10.1
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6) Balance - water, condensate and some soluble inorganic salts.

Pader GQL 0602

The contractor has designed the treatment system for treating the maximum concentrations of these pollutants as well as any concentration up to the maximum. The manufacturer has further guaranteed that the average concentration of the effluent TSS will be 30 ppm. However, under certain conditions and for short periods of time, the concentration of effluent TSS may be as high as 100 ppm. Based on this information, we request that you reconsider our request of March 1, 1977 (GQL 0271), and amend Special Condition A of Industrial Waste Permit #2276209 to allow a maximum TSS concentration of 100 ppm as the maximum concentration for this pollutant. The 60 ppm limitation on TSS causes Met-Ed difficulty in that U. S. Filter has designed and guaranteed the system to meet the EPA limitations on TSS concentrations of 30 ppm average, and 100 ppm maximum. It should be emphasized that while in some cases the maximum TSS concentration may be as high as 100 ppm, the average concentration will be only 30 ppm.

We would also like to point out that the dual media filters used in this treatment system contain both anthracite and sand as filtering media. Furthermore, they are of the pressure type rather than the gravity feed variety. We therefore do not anticipate the problems which are sometimes encountered with the sand type of filter which is used in some sewage treatment facilities.

On a separate issue, we would like to point out that on March 15, 1976, we requested that both IWP #2276209 and #2270204 be amended to allow the use of NALCO 41-L as a corrosion inhibitor in the Secondary Services Closed Cooling Systems at TMI. On April 13, 1977, we received a letter which indicated that IWP #2270204 had been so amended; however, we have not received written verification that TWP #2276209 has also been amended. Mr. J. V. Donato, of your staff, have, through telephone conversations, indicated that IWP #2276209 was also being amended. For our records, we therefore request that you provide written verification that IWP #2276209 has also been amended to allow the above-mentioned use of NALCO 41-L.

We trust this submittal to be satisfactory; however, should you have eny problems, please contact me.

Sincerely,

DRIGHAL SIGNED BY

L. L. Lawyer Manager Generation Quality Assurance

LLL: RAL: eg

Attachment: GQL 0271

cc: Mr. J. V. Donato
PaDER

02.0016.0003.0050.01 50.0021 0007 COMMONWEALTH OF PENNSYLVANIA JUN 10 1977 GENERATION DEPARTMENT OF ENVIRONMENTAL RESOURCES 1002 Health & Welfare Building Harrisburg, Pennsylvania 17120 June 9, 1977 Coples to Industrial Waste Permit No. 2276209 Londonderry Township Dauphin County L. L. Lawyer, Manager Generation Quality Assurance Metropolitan Edison Company P. O. Box 542 Reading, Pennsylvania 19603 Dear Mr. Lawyer: This confirms your letter of May 5, 1977, on the request to modify the suspended solids maximum limit in the above permit. The submission was reviewed and the permit has been modified to a maximum suspended solids limit of 100 mg/l. The second page (amended) of the permit is enclosed. Please destroy the other page and attach this amended page to the permit. Very truly yours, mes V. Donato James V. Donato, P. E. Chief, Facilities Section Harrisburg Regional Office JVD:jvl Enclosure 1564 326

Page 2 Industrial Wastes Londonderry Township Permit No. 2276209 Dauphin County Amended June 9, 1977 This permit is issued subject to all Department of Environmental Resources Rules and Regulations now in force and the following Special Conditions: A. The quality of the effluent discharged from the herein approved treatment works shall be limited at all times as follows: pH not less than 6.0 nor greater than 9.0 Acidity shall not be acid Suspended Solids -30 mg/1 as 7-day average 100 mg/1 maximum at anytime Oil and Grease -15 mg/l as 7-day average 30 mg/l maximum at anytime In addition to the above requirements, the permittee shall provide satisfactory disposal of sludge; and shall reduce the quantities of oil, grease, acids, alkalis, toxic, taste and odor producing substances inimical to the public interest to levels that will not pollute the receiving stream. B. Within six months after the herein approved waste treatment works are constructed and placed in operation, the permittee shall submit to the Department evidence of the efficiency and adequacy of such works in treating the discharges from this establishment. C. The attention of the permittee is directed to the necessity of technical control and experimentation in the operation of the proposed waste treatment works to insure the most effective chemical dosages and proper operation cycles necessary for satisfactory performance at all times. D. Inasmuch as the sufficiency of the proposed treatment will depend in a considerable measure upon the degree to which the production (quantity) of the raw waste is reduced, and whether the treatment works are adjusted to secure maximum efficiency, the permittee shall place the matter of the said reduction of the raw waste pollution load and the operation of the waste treatment works under the direct supervision of a competent sanitary engineer or other qualified person satisfactory to the Department. 1564 327