# PHILADELPHIA ELECTRIC COMPANY

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DAVID R. HELWIG VICE PRESIDENT LIMERICK GENERATING STATION April 22, 1993 Docket Nos. 50-352 50-353 License Nos. NPF-39 NPF-85

Attn: Document Control Desk U. S. Nuclear Regulatory Commission Washington, CD 20555

Subject:

Limerick Generating Station, Units 1 and 2 1992 Annual Environmental Operating Report (Non-Radiological)

Gentlemen:

Attached is the Limerick Generating Station, Units 1 and 2, 1992 Annual Environmental Operating Report (Non-Radiological). This report is being submitted in accordance with Section 5.4.1 of Appendix B of the Facility Operating Licenses, Environmental Protection Plan (EPP) (non-radiological), and describes the implementation of the EPP for 1992.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

MKL:vc Attachment

cc: T. T. Martin, Administrator, Region I, USNRC Neil Perry, USNRC Senior Resident Inspector

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LIMERICK GENERATING STATION UNITS 1 AND 2

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1992 ANNUAL ENVIRONMENTAL OPERATING REPORT (NON-RADIOLOGICAL)

# JANUARY 1992 - DECEMBER 1992

FACILITY OPERATING LICENSE NOS. NPF-39, NPF-85 DOCKET NOS. 50-352, 50-353

PHILADELPHIA ELECTRIC COMPANY

### 1. Introduction

This report describes the implementation of the Environmental Protection Plan (EPP) from January 1, 1992 through December 31, 1992.

Provided herein are summaries and results of the environmental protection activities required by Subsection 4.2 of the EPP.

#### 2.0 Environmental Protection Activities

### 2.1 Aquatic Monitoring

The Environmental Protection Plan states that the NRC will rely on decisions made by the Commonwealth of Pennsylvania, under the authority of the Clean Water Act, for any requirements for aquatic monitoring. Industrial waste NPDES Permit PA 0051926 provides the mechanism for protecting water quality and indirectly aquatic biota. In accordance with the requirements of Section 3 of the Permit, monitoring results were summarized for each month and reported on Discharge Monitoring reports (DMR) which were submitted to the DER and EPA.

A summary of the results as reported in the monthly DMR's is on Table 1. In addition, studies of corbicula and Zebra mussels, fish impingement on the Schuylkill River intake screens, and water quality sampling and observations at Still Creek and Owl Creek Reservoirs were performed in support of LGS in 1992.

Periodic inspections of the Still Creek and Owl Creek reservoirs and receiving streams revealed no sign of increased erosion, sedimentation, or other environmental damage.

Spring and fall surveys for corbicula and Zebra mussels covered several locations in the Point Pleasant Water Diversion System and the Schuylkill River upstream and downstream of LGS. In additon monitoring plates placed in the Schuylkill River and Point Diversion waters were examined monthly (April through November) for Zebra mussels. No Zebra mussels were found, but the range of corbicula in

LGS source waters continued to expand over the areas previously known. Living corbicula and/or shells were found in Bradshaw Reservoir, many locations in the Schuylkill River upstream and downstream pf LGS, including the immediate vicinity of the LGS intake, the Point Pleasant Pumping Station, the Perkiomen Creek and the East Branch Perkiomen Creek.

The Schuylkill River near LGS was occasionally electrofished to obtain Radiological Environmental Monitoring Program samples. Biologists observed young-of-year fishes were relatively abundant, particularly carp and goldfish. Reproduction of most fishes was enhanced by the relatively low, stable river flows that occurred during the spring and early summer.

# 2.2 Terrestrial Monitoring

No terrestrial monitoring is required.

# 2.3 Maintenance of Transmission Line Corridors

Transmission line maintenance records concerning herbicide use are being maintained by the Company's Construction/Transmission and Distribution Division. As required by the EPP, these records can be made available to the NRC upon request.

## 2.4 Noise Monitoring

All noise surveys required by the LGS Final Environmental Statement, Section 5.14.4, Atomic Safety Licensing Board (ASLB) ruling LBP-83-11, dated March 8, 1983, and LGS Appendix B Technical Specifications, Sections 2.3 and 4.2.4. were completed in 1990 for Limerick Generating Station Unit 2 operation and Bradshaw Reservoir. These studies were reported on in the 1990 Annual Environmental Operating Report (Non-radiological).

# 2.5 Environmental Protection Plan

There were two Environmental Protection Plan (EPP) noncompliances identified by the 1992 EPP Audit by the Nuclear Quality Assurance Department.

Corrective Action Request (CAR), Q0003530, identified a failure to provide notification to the NRC of proposed and approved changes to the NPDES permits within the interval required by the EPP. A letter of agreement between Environmental Affairs and Nuclear Licensing identifying responsibilities and timeframes required in corresponding with the NRC is being developed.

Corrective Action Request, Q0003524, identified a failure to submit the monthly Discharge Monitoring Report no later than the 28<sup>th</sup> day of the following month. The CAR also identified a failure to obtain and analyze samples to determine oil & grease and zinc from sampling location 001 within the required once per week periodicity. The station is pursuing clarification and a policy statement from Environmental Affairs on compliance with sampling and analysis frequency schedules.

### 2.6 Changes in Station Design on Operation, Tests or Experiments

There were no changes in the Limerick Generating Station operation that required an Environmental Evaluation in accordance with the requirements of Section 3.1 of the Environmental Protection Plan.

# 2.7 Non-routine Reports Submitted

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Six non-routine reports were submitted in accordance with EPP Subsection 5.4.2. Copies of all letters were supplied to the NRC.

- An NPDES violation for pumping rain water that had accululated in an electrical mamhole into a strom water drain occurred on February 6, 1992. A notification letter was sent on March 25, 1992.
- An NPDES violation for discharging cooling tower blowdown water into Possum Hollow Creekoccurred on March 22, 1992. A notification letter was sent on April 23, 1992.
- An NPDES violation for leakage of sewage from a cracked sewage line cleanout into Possom Hollow Creek occurred on May 4, 1992. A notification letter was sent on June 26, 1992.

- An NPDES violation for exceeding the maximum permitted total zinc concentration occurred on October 13 and 14, 1992. A notification letter was sent on November 23, 1992.
- NPDES violations for exceeding the maximum permitted total zinc concentration occurred on November 17, 1992 and November 25, 1992. A notification letter was sent on January 25, 1993.
- An NPDES violation for not continuously monitoring dissolved oxygen in the Bradshaw Reservoir discharge occurred from November 4, 1992 to November 6, 1992. A notification letter was sent on December 24, 1992.

#### TABLE 1

#### YEARLY MEAN AND RANGE OR MAXIMUM (AS APPROPRIATE) OF PARAMETERS REPORTED IN THE 1992 DISCHARGE MONITORING REPORTS

| DTO        | CONAL      | P/3F  | NUMB    | TD #    |
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|                    | 001          | 201A          | ULA                   |
|--------------------|--------------|---------------|-----------------------|
| INLET TEMP., F     |              |               |                       |
| maximum            | 76           | NR**          | NR                    |
| mean               | 57 +/- 24*** | NR            | NR                    |
| DISCHARGE TEMP.,   | F            |               |                       |
| maximum            | 88           | NR            | NR                    |
| mean               | 72 +/- 16    | NR            | NR                    |
| pH, range          | 7.1 - 8.8    | NR            | NR                    |
| FLOW, MGD          |              |               |                       |
| maximum            | 15 0         | 0.84          |                       |
| mean               | 01./- 2.0    | 0.04          | NR<br>0.008 +/- 0.008 |
| AUG 0.11           | 3.1 +/- 3.0  | 0.20 +/- 0.14 | 0.008 +/- 0.008       |
| CHLORINE, MG/L     |              |               |                       |
| maximum            | <0.1         | NR            | NR                    |
| range              | <0.01 - <0.1 | NR            | NR                    |
| BETZ CT-1, MG/L    |              |               |                       |
| maximum            | 0.17         | NR            | NR                    |
| range              | 0.04 - 0.17  | NR            | NR                    |
| TOTAL SUSP. SOLIDS | , MG/L       |               |                       |
| maximum            | NR           | 24.5          | NR                    |
| mean               | NR           | 10.0 +/- 5.6  | NR                    |
| OIL & GREASE, MG/L |              |               |                       |
| maximum            | NR           | 4.8           | NR                    |
| mean               | <0.85        | <0.94         | NR                    |
|                    |              |               |                       |

\* There were no discharges reported for 1392 from discharge no. 101A

\* NR = not reported.

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\*\*\* Reported as mean +/- 2 s.d.

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