

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

May 31, 1984

U.S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75270

Attention: Mr. Fred Humke

Texas Utilities Generating Company
Comanche Peak Steam Electric Station
NPDES Permit #TX0065854

Gentlemen:

In regard to the draft NPDES permit (TX0065854) covering the Company's Comanche Peak Steam Electric Station, we submit the following comments:

1. Outfall 101 (Page 6 of 32):

To be consistent with the Texas Department of Water Resources' (TDWR) permit covering CPSES (01854), the monitoring frequency for flow should be changed from Daily Average to 1/day.

2. Outfall 201 (page 8 of 32):

The Company requested, in March 12, 1984 letter, the temperature limitations for the condenser cooling water be increased to 113° F (daily average) and 116° F (daily max.). EPA concurred with this request, as stated in the Response to Comment Section. However, the 113° F daily average is not reflected on page 8 of 32 or the Public Notice. The 110° F daily average needs to be corrected to 113° F. The 116° F daily max. is correct.

3. Outfall 301 (Page 10 of 32):

To be consistent with the TDWR permit, monitoring frequency for flow should be changed from Daily Average to 1/day.

Footnotes should be deleted or asterisks (*) placed in the limitations, referencing these footnotes.

We appreciate EPA's cooperation and effort in developing the permit. The permit is acceptable to the Company, given the aforementioned

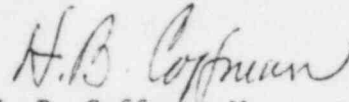
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Handwritten notes:
Hool 1/0 Add: WSIC - 104
M. Rushbrook - 104
B. D. Youngblood - 104
S. Burnett - 104
Per Ballard - 104
John Rear - 104
BC 4071 - 7045
Per M. Rushbrook

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corrections are made. Please call if additional information is needed.
We look forward to receipt of the final permit.

Very truly yours,



H. B. Coffman, Manager
Environmental Services

PZ:jl

cc: ✓ Mr. B. J. Youngblood, Chief
Nuclear Regulatory Commission
Licensing Branch No. 1, Division of Licensing